

# EXHIBIT 19



Transcript of the Deposition of  
**Jennifer Walker**

**Case:** James Fletcher Jr. v. Jerome Bogucki; et al.

**Taken On:** February 14, 2024

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JAMES FLETCHER JR.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 20 CV 4786
	)	
JEROME BOGUCKI, ANTHONY	)	
NORADIN, RAYMOND SCHALK,	)	
ANTHONY WOJCIK, UNKNOWN CITY	)	
OF CHICAGO POLICE OFFICERS,	)	
and the CITY OF CHICAGO,	)	
	)	
Defendants.	)	

The deposition of JENNIFER WALKER, called by the Defendant for examination, taken pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken via videoconference before Kari Wiedenhaupt, Certified Shorthand Reporter commencing at 10:32 a.m. on February 14, 2024.

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23  
24

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1 APPEARANCES (via videoconference) CONT'D:

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8 On behalf of the State's Attorney's  
9 Office;

10 ALSO PRESENT: Lo Ramanujam, paralegal at  
11 Hale & Monico

12 \* \* \* \* \*

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1 I N D E X

2 WITNESS PAGE

3 JENNIFER WALKER

4 Examination by Ms. West 5

5 Examination by Mr. Starr 159

6

7

8

9

10

11 E X H I B I T S

12 NUMBER MARKED FOR ID

13 Walker Deposition Exhibit

14 No. 1 17

15 No. 2 66

16 No. 3 88

17 No. 4 125

18 No. 5 130

19 No. 6 136

20 No. 7 144

21 No. 8 156

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Page 5	<p>1 (Whereupon, the witness was duly</p> <p>2 sworn.)</p> <p>3 JENNIFER WALKER,</p> <p>4 having been first duly sworn, was examined via</p> <p>5 videoconference and testified as follows:</p> <p>6 WHEREUPON:</p> <p>7 EXAMINATION</p> <p>8 BY MS. WEST:</p> <p>9 <b>Q. Ms. Walker, can you please state your</b></p> <p>10 <b>full name for the record and spell your last</b></p> <p>11 <b>name, please?</b></p> <p>12 A. Sure. Jennifer, J-E-N-N-I-F-E-R,</p> <p>13 Walker, W-A-L-K-E-R.</p> <p>14 <b>Q. Ms. Walker, I -- my name is Allyson</b></p> <p>15 <b>West. I represent some individual officers that</b></p> <p>16 <b>are sued in a lawsuit by James Fletcher.</b></p> <p>17 <b>Have you ever been deposed before?</b></p> <p>18 A. I have.</p> <p>19 <b>Q. Okay. How many times have you been</b></p> <p>20 <b>deposed before?</b></p> <p>21 A. I believe twice, but I'm not</p> <p>22 100 percent sure.</p> <p>23 <b>Q. Okay. I won't bore you with all the</b></p> <p>24 <b>ground rules, but if at any point you need to</b></p>	Page 7	<p>1 <b>Q. Okay. And did you review those</b></p> <p>2 <b>documents?</b></p> <p>3 A. I did read them, yes.</p> <p>4 <b>Q. Okay. Do you recall specifically what</b></p> <p>5 <b>documents were included in that packet?</b></p> <p>6 A. So I have them -- I printed them out,</p> <p>7 and they are to my left. And so if I'm looking</p> <p>8 over here, I'm looking at the documents, just so</p> <p>9 you know.</p> <p>10 <b>Q. Okay.</b></p> <p>11 A. There was an attachment full of what</p> <p>12 appears to be what we would call Felony --</p> <p>13 copies of Felony Review files.</p> <p>14 <b>Q. Uh-huh.</b></p> <p>15 A. There is a handwritten -- what appears</p> <p>16 to be a handwritten statement of Terry Rogers</p> <p>17 and a grand jury transcript involving testimony</p> <p>18 of Terry Rogers, a -- what appears to be a</p> <p>19 handwritten statement of Sheeree [sic] Friend,</p> <p>20 and grand jury testimony of Sheeree Friend, a --</p> <p>21 what appears to be a CPD sup report from</p> <p>22 December of 1990, a document entitled</p> <p>23 "Declaration" made by someone named Emmett Wade,</p> <p>24 a Felony 101 sheet, a grand jury transcript of</p>
Page 6	<p>1 <b>take a break, please let me know, and we'll take</b></p> <p>2 <b>that break.</b></p> <p>3 <b>If you any point you don't understand</b></p> <p>4 <b>my question, please let me know, and I will</b></p> <p>5 <b>repeat it or rephrase it in hopes to help you</b></p> <p>6 <b>understand the questions. Understand?</b></p> <p>7 A. Yes.</p> <p>8 <b>Q. Where are you currently located today?</b></p> <p>9 A. My office at 26th Street.</p> <p>10 <b>Q. Are you utilizing the Zoom platform</b></p> <p>11 <b>from your computer or a phone?</b></p> <p>12 A. From a computer.</p> <p>13 <b>Q. Okay. Is there anything else up on</b></p> <p>14 <b>your screen other than the Zoom?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Is anyone else present in the room with</b></p> <p>17 <b>you?</b></p> <p>18 A. No. I'm -- I'm in my office with the</p> <p>19 door closed, and no one else is here.</p> <p>20 <b>Q. Did you review any documents in</b></p> <p>21 <b>preparation for your deposition today?</b></p> <p>22 A. I did read documents that were sent by</p> <p>23 my attorneys -- by John Coyne's office that I</p> <p>24 was told were related to this deposition.</p>	Page 8	<p>1 Jennifer Gonzalez's testimony that looks like it</p> <p>2 was an indictment.</p> <p>3 <b>Q. Mm-hmm.</b></p> <p>4 A. A sup -- a CPD sup report that was</p> <p>5 printed on May 24th of 2002, a picture of five</p> <p>6 men, a group of -- a collection of pictures of</p> <p>7 men that appeared to be printed from the IDOC</p> <p>8 website, and a document that purports to be an</p> <p>9 arrest warrant pertaining to James Fletcher.</p> <p>10 <b>Q. Okay.</b></p> <p>11 A. And just one more thing I want people</p> <p>12 to know is that I wrote in blue kind of a</p> <p>13 summary of what something is on the top of these</p> <p>14 documents that I printed out just so it would</p> <p>15 make it easier for me to find them on my desk,</p> <p>16 because they -- you know, they're photocopies</p> <p>17 and they all kind of look alike.</p> <p>18 <b>Q. Absolutely.</b></p> <p>19 A. So if there's blue marks on it, that's</p> <p>20 what those blue marks are.</p> <p>21 <b>Q. Okay. I understand. Thank you for</b></p> <p>22 <b>telling us that. And thank you for going</b></p> <p>23 <b>through what you looked at.</b></p> <p>24 <b>You are a licensed attorney, correct?</b></p>

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<p style="text-align: right;">Page 9</p> <p>1 A. Yes.</p> <p>2 <b>Q. And how long have you been licensed?</b></p> <p>3 A. Since 19- -- November of 1994.</p> <p>4 <b>Q. And where are you currently employed?</b></p> <p>5 A. The Cook County State's Attorney's</p> <p>6 Office.</p> <p>7 <b>Q. And how long have you been with the</b></p> <p>8 <b>Office?</b></p> <p>9 A. Since August of 1997.</p> <p>10 <b>Q. What is your current assignment?</b></p> <p>11 A. I am the supervisor of the complex</p> <p>12 narcotics unit.</p> <p>13 <b>Q. At some point in time in your career at</b></p> <p>14 <b>the State's Attorney's Office, were you in</b></p> <p>15 <b>Felony Review?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. Were you in Felony Review more than one</b></p> <p>18 <b>time?</b></p> <p>19 A. No.</p> <p>20 <b>Q. Okay. When were you in Felony Review?</b></p> <p>21 A. From the fall of 2001 until, I believe,</p> <p>22 the late summer, early fall of 2000- -- 2003.</p> <p>23 <b>Q. Okay. When you were an assistant</b></p> <p>24 <b>state's attorney in the -- in Felony Review,</b></p>	<p style="text-align: right;">Page 11</p> <p>1 <b>Q. Did you ever facilitate a witness going</b></p> <p>2 <b>to the grand jury to testify by calling another</b></p> <p>3 <b>assistant state's attorney who was assigned to</b></p> <p>4 <b>that division and give them a heads-up?</b></p> <p>5 MR. STARR: Objection to form.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I don't remember ever calling an ASA in</p> <p>8 the grand jury unit and telling them someone was</p> <p>9 coming. I know I would make rec- -- I would</p> <p>10 tell the police officers that someone should be</p> <p>11 taken to the grand jury, but I didn't -- I don't</p> <p>12 remember getting involved in the arrangements of</p> <p>13 that happening.</p> <p>14 BY MS. WEST:</p> <p>15 <b>Q. Thank you.</b></p> <p>16 <b>And you -- you testified earlier that</b></p> <p>17 <b>part of this process is making a</b></p> <p>18 <b>determination on a recommendation for charges;</b></p> <p>19 <b>is that right?</b></p> <p>20 A. Correct.</p> <p>21 <b>Q. Generally speaking, when you're on</b></p> <p>22 <b>Felony Review, do you have to make that</b></p> <p>23 <b>recommendation to a supervisor?</b></p> <p>24 A. On Felony Review I did have</p>
<p style="text-align: right;">Page 10</p> <p>1 <b>what did your duties and responsibilities</b></p> <p>2 <b>consist of?</b></p> <p>3 A. When I was on Felony Review, I would --</p> <p>4 we would review cases to see about filing -- if</p> <p>5 felony charges would be brought. We would</p> <p>6 review police reports at -- we would interview</p> <p>7 witnesses at times, speak with defendants if</p> <p>8 they wished to speak to us. We would make</p> <p>9 charging decisions.</p> <p>10 <b>Q. Okay. And you mentioned that you</b></p> <p>11 <b>would -- you would speak with witnesses from</b></p> <p>12 <b>time to time; is that right?</b></p> <p>13 A. Correct.</p> <p>14 <b>Q. Okay. Would you ever facilitate people</b></p> <p>15 <b>testifying before the grand jury?</b></p> <p>16 A. I'm not sure what you mean by</p> <p>17 "facilitate."</p> <p>18 <b>Q. Was there ever an instance when you</b></p> <p>19 <b>would transport or take a witness after</b></p> <p>20 <b>interviewing them from whatever area or police</b></p> <p>21 <b>station you were speaking with them at to the</b></p> <p>22 <b>grand jury to testify?</b></p> <p>23 A. I never trans- -- I don't remember ever</p> <p>24 transporting a witness to the grand jury.</p>	<p style="text-align: right;">Page 12</p> <p>1 conversations with supervisors about what</p> <p>2 charging decisions should be made. It -- it</p> <p>3 wasn't necessarily that I was telling the</p> <p>4 supervisor what to charge.</p> <p>5 MR. HOLMES: On behalf of the State's</p> <p>6 Attorney's Office, just given the nature of the</p> <p>7 question and ASA's Walker's response just given,</p> <p>8 I would caution and instruct the witness not to</p> <p>9 reveal the substance of any charging decision</p> <p>10 conversations with supervisors or colleagues</p> <p>11 pursuant to the deliberative process privilege</p> <p>12 of the Office.</p> <p>13 BY MS. WEST:</p> <p>14 <b>Q. Do you have an independent recollection</b></p> <p>15 <b>of working on Mr. James Fletcher's case in -- as</b></p> <p>16 <b>a Felony Review assistant state's attorney in</b></p> <p>17 <b>2002?</b></p> <p>18 A. I have a general recollection, but I</p> <p>19 don't have a specific recollection.</p> <p>20 <b>Q. Tell me what your general recollection</b></p> <p>21 <b>is.</b></p> <p>22 A. I remember that I was involved in the</p> <p>23 review process of a case of -- of this -- of a</p> <p>24 case involving a bread truck driver. I remember</p>

6 (Pages 9 to 12)



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Page 13	<p>1 that I was involved in it on several days. I</p> <p>2 don't remember -- I remember going with</p> <p>3 detectives to IDOC to interview the defendant.</p> <p>4 I do not remember the specifics of</p> <p>5 what -- what IDOC facility we went to. I do not</p> <p>6 remember the conversation between myself, the</p> <p>7 detectives, and the defendant. I do not</p> <p>8 remember specific conversations with witnesses.</p> <p>9 I just have a general memory of -- of</p> <p>10 recognition, should I say?</p> <p>11 <b>Q. Prior to reading the documents, did you</b></p> <p>12 <b>have an independent recollection of the</b></p> <p>13 <b>detectives that were involved in the case of</b></p> <p>14 <b>James Fletcher?</b></p> <p>15 A. I didn't know who the detectives were</p> <p>16 until I read the documents, so I would say no.</p> <p>17 <b>Q. And now are you informed or is your</b></p> <p>18 <b>recollection refreshed as to who detectives were</b></p> <p>19 <b>that were involved in the case?</b></p> <p>20 A. I do -- after reading their names and</p> <p>21 I -- and thinking about it for a second, I do</p> <p>22 recognize the names, and I do remember -- I have</p> <p>23 a vague recollection of -- of what they looked</p> <p>24 like.</p>	Page 15	<p>1 A. I don't remember.</p> <p>2 <b>Q. Had you worked with Detective Schalk --</b></p> <p>3 <b>or have you -- excuse me -- worked with</b></p> <p>4 <b>Detective Schalk since working with him in 2002?</b></p> <p>5 A. I -- I don't remember.</p> <p>6 <b>Q. Same question for Noradin: Had you</b></p> <p>7 <b>worked with Detective Noradin prior to 2002?</b></p> <p>8 A. I -- I don't remember.</p> <p>9 <b>Q. And --</b></p> <p>10 A. I'm probably going to say I don't</p> <p>11 remember to this question too.</p> <p>12 <b>Q. That's fine.</b></p> <p>13 <b>And have you worked with Detective</b></p> <p>14 <b>Noradin since 2002?</b></p> <p>15 A. I don't remember.</p> <p>16 <b>Q. When you were first assigned to a case</b></p> <p>17 <b>on Felony Review, what would you do to get</b></p> <p>18 <b>yourself familiar with the investigation?</b></p> <p>19 MR. COYNE: Objection, foundation.</p> <p>20 Go ahead.</p> <p>21 BY THE WITNESS:</p> <p>22 A. Typically, I would -- it would depend</p> <p>23 on if it was a phone case or a -- what we would</p> <p>24 call a personal case where we would respond in</p>
Page 14	<p>1 <b>Q. And who were the detectives involved</b></p> <p>2 <b>that you worked with on Mr. Fletcher's case?</b></p> <p>3 A. Detective Schalk and Detective Bogucki.</p> <p>4 <b>Q. Any other detectives that you recall</b></p> <p>5 <b>that worked on the case?</b></p> <p>6 A. Not that I can -- not that I remember.</p> <p>7 <b>Q. Okay. Did you ever work with a</b></p> <p>8 <b>Detective Noradin, Anthony Noradin?</b></p> <p>9 A. I know when I was on Felony Review I</p> <p>10 worked with Detective Noradin.</p> <p>11 <b>Q. Do you have a recollection of him being</b></p> <p>12 <b>involved in Mr. Fletcher's case at all?</b></p> <p>13 MR. STARR: Asked and answered.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I -- I don't as I sit here today.</p> <p>16 BY MS. WEST:</p> <p>17 <b>Q. Had you worked with Detective Bogucki</b></p> <p>18 <b>prior to 2002?</b></p> <p>19 A. I don't remember.</p> <p>20 <b>Q. Have you worked with Detective Bogucki</b></p> <p>21 <b>since Mr. Fletcher's case in 2002?</b></p> <p>22 A. I don't remember that.</p> <p>23 <b>Q. Had you worked with Detective Schalk</b></p> <p>24 <b>prior to 2002?</b></p>	Page 16	<p>1 person. If it was a -- if it was a personal</p> <p>2 case, I would go -- I would typically go, meet</p> <p>3 the detectives wherever they were at a police</p> <p>4 station. I would have a conversation with them,</p> <p>5 and I would review any reports that were ready</p> <p>6 for me to review at that time.</p> <p>7 BY MS. WEST:</p> <p>8 <b>Q. How did it differ when it was a phone</b></p> <p>9 <b>case?</b></p> <p>10 A. If it was a phone case, typically, I</p> <p>11 was having a conversation with an officer over</p> <p>12 the phone. I would never have -- I wouldn't</p> <p>13 have met them in person. And typically, on</p> <p>14 phone cases, we did not receive reports to</p> <p>15 review. It was -- the review process was mostly</p> <p>16 a conversation with the officer or the</p> <p>17 detective.</p> <p>18 <b>Q. Understood.</b></p> <p>19 BY MS. WEST:</p> <p>20 <b>Q. I'm going to mark what you have got in</b></p> <p>21 <b>front of you, but I will share it on the screen</b></p> <p>22 <b>if you'd prefer as well. Let's mark the Felony</b></p> <p>23 <b>Review folder as Exhibit 1.</b></p> <p>24</p>

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Page 17	<p>1 (Whereupon, Walker Deposition</p> <p>2 Exhibit No. 1 was marked for</p> <p>3 identification.)</p> <p>4 BY THE WITNESS:</p> <p>5 A. If you don't mind, I'm going to look at</p> <p>6 it.</p> <p>7 BY MS. WEST:</p> <p>8 Q. Yes.</p> <p>9 A. Because I can't see it very well on my</p> <p>10 screen.</p> <p>11 MR. COYNE: Allyson, if you would still post</p> <p>12 it on the screen, I would appreciate it. I have</p> <p>13 some of the documents printed out, but not all.</p> <p>14 MS. WEST: Okay. I'll do that.</p> <p>15 And I agree with you, Ms. Walker. I</p> <p>16 have it printed, because I think it's hard to</p> <p>17 follow on the screen.</p> <p>18 So for the record, it is</p> <p>19 CCSAO_Conflicts_FletcherDixonBogucki_20cv4768_</p> <p>20 0003014 through 003040. All right. Let me get</p> <p>21 this pulled up really quick.</p> <p>22 BY MS. WEST:</p> <p>23 Q. Okay. Ms. Walker, can you see -- well,</p> <p>24 do you have what we previously marked as</p>	Page 19	<p>1 Okay. Based on the document in front</p> <p>2 of you, what type of charges were you</p> <p>3 investigating relative to Mr. Fletcher?</p> <p>4 A. Well, I'm looking at this folder. I</p> <p>5 don't remember creating this -- or I'm looking</p> <p>6 at this piece -- this copy of a folder. I don't</p> <p>7 remember creating this folder. I do see writing</p> <p>8 on there that looks like my handwriting. I see</p> <p>9 writing that is not my handwriting, and the</p> <p>10 folder itself in not my -- in handwriting I can</p> <p>11 say is not my handwriting says "murder" on it.</p> <p>12 Q. Okay. Can you tell me on -- I'm sorry.</p> <p>13 Did I cut you off?</p> <p>14 A. No. You're fine.</p> <p>15 Q. On this first page that we are looking</p> <p>16 at, which is 3014, what on this folder front is</p> <p>17 your handwriting?</p> <p>18 A. Well, in the upper left corner, the</p> <p>19 words "Fletcher, comma, James," looks like it</p> <p>20 could be my handwriting, but I don't remember</p> <p>21 writing on this document.</p> <p>22 Q. Okay. I'm going to direct your</p> <p>23 attention -- well, let me ask you this before we</p> <p>24 go there: Do you have an independent</p>
Page 18	<p>1 Exhibit 1 in front of you, which is the Felony</p> <p>2 Review folder?</p> <p>3 A. I do.</p> <p>4 Q. Okay. And then it's also up on the</p> <p>5 screen.</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. A couple just preliminary</p> <p>9 questions about this document itself.</p> <p>10 Is there anything else -- and when I</p> <p>11 call it the Felony Review folder, is there</p> <p>12 anything else other than this that is typically</p> <p>13 included in the Felony Review folder?</p> <p>14 A. Other than this, the document on the</p> <p>15 screen?</p> <p>16 Q. Correct.</p> <p>17 A. Okay. Well, this appears to be a copy</p> <p>18 of the outside of a Felony Review folder.</p> <p>19 Inside the Felony Review folder there was a --</p> <p>20 were carbon sheets that had a place to place</p> <p>21 certain information, but since this is the</p> <p>22 outside of the folder, you wouldn't be able to</p> <p>23 see those papers as we look at it now.</p> <p>24 Q. Okay. Thank you for the clarification.</p>	Page 20	<p>1 recollection of when you first became involved</p> <p>2 with the review of Mr. Fletcher's case?</p> <p>3 A. I do not.</p> <p>4 Q. After looking at the Felony Review</p> <p>5 folder documents, did that refresh your memory</p> <p>6 as to when you first became involved?</p> <p>7 A. I don't remember creating any of these</p> <p>8 documents, so it's -- it's hard for me to say</p> <p>9 that I -- that I know that.</p> <p>10 Q. Can you take a look at -- it's -- at</p> <p>11 the bottom the Bates is 3018 or page 5 of the</p> <p>12 document.</p> <p>13 A. So I -- I'm sorry. What's the Bates</p> <p>14 number?</p> <p>15 Q. Sure. 3018.</p> <p>16 A. To make it easier for myself to prep, I</p> <p>17 took -- I took that file apart. Oh, you have</p> <p>18 got it up on the screen now. Okay.</p> <p>19 Q. I do. Thanks.</p> <p>20 A. Hold on. That will help. Sorry.</p> <p>21 Q. No, no. You're fine.</p> <p>22 A. And just so -- because I'm having a</p> <p>23 little trouble seeing some of this --</p> <p>24 Q. Yes.</p>

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Page 21	<p>1 A. -- the date on this is -- it looks like</p> <p>2 it's 13 February 02, Action No. 55? Is that</p> <p>3 what you see?</p> <p>4 <b>Q. Yes.</b></p> <p>5 A. Okay. Yes. I've got that in front of</p> <p>6 me now. Thank you.</p> <p>7 <b>Q. Okay. Okay. Great.</b></p> <p>8 <b>Is this document -- and when I say this</b></p> <p>9 <b>document, specifically this page, 3018 -- in</b></p> <p>10 <b>your handwriting?</b></p> <p>11 A. I don't remember creating this</p> <p>12 document, but the handwriting on this -- on this</p> <p>13 document looks like my handwriting.</p> <p>14 <b>Q. You note under charges -- well, strike</b></p> <p>15 <b>that.</b></p> <p>16 <b>There is writing under charges that</b></p> <p>17 <b>looks like it says, "first-degree murder, armed</b></p> <p>18 <b>robbery."</b></p> <p>19 <b>Do you see that?</b></p> <p>20 A. I do see that.</p> <p>21 <b>Q. And next to that there is the word</b></p> <p>22 <b>"action," and it has the letters "CI."</b></p> <p>23 <b>What does that mean?</b></p> <p>24 A. So when -- on Felony Review, when ASAs</p>	Page 23	<p>1 evidence, your legal theories, your strategies,</p> <p>2 or your decisions; basically, everything that</p> <p>3 constitutes your mental impressions.</p> <p>4 If in order to answer these questions,</p> <p>5 including the interpretation of what appears to</p> <p>6 be an abbreviation -- if in order to do that you</p> <p>7 would need to reveal your mental impressions of</p> <p>8 your work as a prosecutor, I would instruct you</p> <p>9 not to answer that question pursuant to Federal</p> <p>10 Rule 26 and the work product doctrine. If you</p> <p>11 can answer the question or questions without</p> <p>12 doing so, then you may proceed.</p> <p>13 Do you understand the instruction?</p> <p>14 THE WITNESS: I do. Thank you.</p> <p>15 MR. COYNE: Okay.</p> <p>16 MR. HOLMES: Same guidance and same</p> <p>17 instruction on behalf of the State's Attorney's</p> <p>18 Office on grounds of deliberative process</p> <p>19 privilege.</p> <p>20 THE WITNESS: I'm sorry. Could you state the</p> <p>21 question again?</p> <p>22 MS. WEST: Absolutely. Can you read it back,</p> <p>23 please? Thank you.</p> <p>24</p>
Page 22	<p>1 are reviewing a case, there is typically three</p> <p>2 actions. There is approve, there is a reject,</p> <p>3 or CI, which I believe stands for continuing</p> <p>4 investigation.</p> <p>5 <b>Q. And below that it looks like it's a W</b></p> <p>6 <b>with a circle around it, and it says, "ASA</b></p> <p>7 <b>O'Brien."</b></p> <p>8 <b>Do you see that?</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. Do you know who that individual is?</b></p> <p>11 A. I don't remember creating this</p> <p>12 document, and I -- in order -- in order -- I</p> <p>13 have a guess, but I don't know for certain who</p> <p>14 that person would -- would be.</p> <p>15 <b>Q. Do you have any idea what the W with</b></p> <p>16 <b>the circle, that shorthand, stands for?</b></p> <p>17 MR. COYNE: Let me just instruct you -- first</p> <p>18 of all, objection, foundation. Secondly, in</p> <p>19 terms of answering these questions -- and I'm</p> <p>20 going to give you instruction now just to</p> <p>21 avoid -- potentially avoid interruptions.</p> <p>22 I would instruct you not to answer any</p> <p>23 question if in order to answer the question you</p> <p>24 would need to reveal your opinions about the</p>	Page 24	<p>1 (Whereupon, the record was read</p> <p>2 as requested.)</p> <p>3 BY THE WITNESS:</p> <p>4 A. I don't -- as I said before, I don't</p> <p>5 remember creating this document. It is possible</p> <p>6 that the character inside the circle is an N,</p> <p>7 not a W, to indicate notification.</p> <p>8 BY MS. WEST:</p> <p>9 <b>Q. Thank you.</b></p> <p>10 <b>And what is -- what does notification</b></p> <p>11 <b>mean?</b></p> <p>12 MR. COYNE: Foundation.</p> <p>13 THE WITNESS: Should I answer?</p> <p>14 MR. COYNE: You can answer consistent with</p> <p>15 the instruction previously provided and if you</p> <p>16 know.</p> <p>17 BY THE WITNESS:</p> <p>18 A. It would indicate that I notified -- it</p> <p>19 would indicate that a notification was made to a</p> <p>20 supervisor.</p> <p>21 BY MS. WEST:</p> <p>22 <b>Q. Next to "action" has the title</b></p> <p>23 <b>"reason."</b></p> <p>24 <b>Do you see that?</b></p>

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Page 25	<p>1 A. Yes.</p> <p>2 <b>Q. Can you read what's listed, Nos. 1</b></p> <p>3 <b>through 4, if -- if you can read it?</b></p> <p>4 A. In real life the sheets inside the</p> <p>5 Felony Review folder are much bigger. This</p> <p>6 piece of paper that I have been given, the</p> <p>7 writing has shrunk. I -- it is difficult for me</p> <p>8 to read all of this because the writing is</p> <p>9 small.</p> <p>10 <b>Q. Does that help you at all --</b></p> <p>11 A. Yes, it does.</p> <p>12 <b>Q. -- that I just expanded?</b></p> <p>13 A. Thank you.</p> <p>14 <b>Q. Okay.</b></p> <p>15 A. It has "1" -- it says, "interview</p> <p>16 delta. 2, find Sheeree Friend, something,</p> <p>17 interview, slash" -- I'm not sure what that</p> <p>18 word is. 3, find Emmett Wade, something,</p> <p>19 interview" -- I can't read that. I believe, 4,</p> <p>20 "run live lineup with Edward" -- I think -- I'm</p> <p>21 not sure what that last -- there is -- the copy</p> <p>22 is not the greatest, and I can't read that last</p> <p>23 word.</p> <p>24 <b>Q. Thank you.</b></p>	Page 27	<p>1 charging decision or noncharging decision.</p> <p>2 THE WITNESS: And -- I'm sorry. Can we</p> <p>3 repeat that question just so I know what I --</p> <p>4 MS. WEST: Sure.</p> <p>5 THE WITNESS: -- remember what to answer?</p> <p>6 MS. WEST: Sure. Do you mind reading it</p> <p>7 back, please?</p> <p>8 (Whereupon, the record was read</p> <p>9 as requested.)</p> <p>10 MR. HOLMES: Same guidance and instruction on</p> <p>11 behalf of the Office.</p> <p>12 MR. COYNE: Same objection.</p> <p>13 BY THE WITNESS:</p> <p>14 A. So typically -- if a case was continued</p> <p>15 for further investigation, typically, the ASA</p> <p>16 would list things that would be -- we would like</p> <p>17 to have done or goals before we would be able</p> <p>18 to -- to complete before we would be able to</p> <p>19 make a decision on charging the case.</p> <p>20 BY MS. WEST:</p> <p>21 <b>Q. Below here you indicate -- I'm sorry.</b></p> <p>22 <b>Under "Statement," do you see writing</b></p> <p>23 <b>in that box? And it starts with "defendant or</b></p> <p>24 <b>delta"?</b></p>
Page 26	<p>1 <b>Now, what is the purpose of -- strike</b></p> <p>2 <b>that.</b></p> <p>3 <b>What do you typically list when you're</b></p> <p>4 <b>on Felony Review under the title of "reason?"</b></p> <p>5 MR. COYNE: Same instruction as previously</p> <p>6 provided, Jennifer. With respect to the work</p> <p>7 product doctrine, you can answer questions</p> <p>8 generally without regard to a specific case.</p> <p>9 However, if in order to answer the question, you</p> <p>10 would need to divulge your mental impressions</p> <p>11 with respect to a particular case, then the work</p> <p>12 product privilege would apply, and I would</p> <p>13 instruct you not to answer that question. I</p> <p>14 know you had testified you don't remember</p> <p>15 reading this document, but I wanted to provide</p> <p>16 you that instruction going forward.</p> <p>17 Do you understand?</p> <p>18 THE WITNESS: Yes. Thank you.</p> <p>19 MR. COYNE: All right. Please proceed.</p> <p>20 MR. HOLMES: And same guidance and same</p> <p>21 instruction on behalf of the State's Attorney's</p> <p>22 Office on the grounds of deliberative process</p> <p>23 privilege as to any question that would seek to</p> <p>24 elicit information regarding the why of a</p>	Page 28	<p>1 A. I do see writing in the box. As I have</p> <p>2 stated before, I don't remember creating this</p> <p>3 document, but I do see writing in the box.</p> <p>4 <b>Q. Okay. Can you read what that says?</b></p> <p>5 A. "Delta not in custody for this case.</p> <p>6 Paren, delta currently in" -- I'm not sure what</p> <p>7 that word is, but then I -- IDO- -- "something</p> <p>8 IDOC, closed paren."</p> <p>9 <b>Q. Okay. And you testified that you had a</b></p> <p>10 <b>recollection of going to IDOC to speak with</b></p> <p>11 <b>Mr. Fletcher; is that right?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. Okay. As you sit here today, do you</b></p> <p>14 <b>have an independent recollection of documenting</b></p> <p>15 <b>that he was in custody -- not in custody for</b></p> <p>16 <b>this specific case?</b></p> <p>17 A. I do not have an independent</p> <p>18 recollection, no.</p> <p>19 <b>Q. Are you aware that this armed robbery</b></p> <p>20 <b>took place in December of 1990?</b></p> <p>21 A. I read in the police reports to prepare</p> <p>22 for the deposition that there was an armed</p> <p>23 robbery that allegedly took place then, yes.</p> <p>24 <b>Q. And you weren't involved in the case by</b></p>

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Page 29	<p>1 <b>way of Felony Review until 2002, correct?</b></p> <p>2 A. I wasn't on Felony Review until 2001,</p> <p>3 so right.</p> <p>4 <b>Q. Okay. Do you have a recollection as to</b></p> <p>5 <b>why this case was at the Felony Review stage in</b></p> <p>6 <b>2002 when the crime happened in 1990?</b></p> <p>7 MR. COYNE: Objection to form, foundation.</p> <p>8 Again, I would repeat the earlier instruction,</p> <p>9 Jennifer. In addition, I would instruct you not</p> <p>10 to answer any questions that would alternately</p> <p>11 require you to divulge anything I told you</p> <p>12 during our confidential preparation for your</p> <p>13 deposition in this case.</p> <p>14 With those instructions, you can</p> <p>15 proceed.</p> <p>16 MR. HOLMES: And on behalf of the Office to</p> <p>17 elaborate on the State's Attorney's deliberative</p> <p>18 process objection, the deliberative process</p> <p>19 privilege protects communications that are part</p> <p>20 of the decision-making process to reach a</p> <p>21 charging or noncharging decision. And so I</p> <p>22 would instruct ASA Walker not to respond in a</p> <p>23 way that would disclose any of the Office's</p> <p>24 deliberations concerning whether to charge or</p>	Page 31	<p>1 BY THE WITNESS:</p> <p>2 A. I have no independent recollection.</p> <p>3 MR. COYNE: Hang on. Hang on a second.</p> <p>4 Yeah, Jennifer, hang on a second. Let me just</p> <p>5 make my objection.</p> <p>6 And if you pause between the</p> <p>7 question -- if you pause for a moment, that will</p> <p>8 give the attorneys an opportunity to object</p> <p>9 without stepping on your answer going forward.</p> <p>10 So, also, objection, foundation. Objection,</p> <p>11 speculation. And if you did remember the</p> <p>12 answer, please keep in mind your earlier</p> <p>13 instruction as to work product.</p> <p>14 MR. HOLMES: Same objection and instruction</p> <p>15 on behalf of the State's Attorney's Office on</p> <p>16 grounds of deliberative process privilege.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I don't recall. And as I said before,</p> <p>19 I don't remember authoring this document.</p> <p>20 BY MS. WEST:</p> <p>21 <b>Q. Under reason, No. 3, where it says,</b></p> <p>22 <b>"find Emmett Wade," do you have a recollection</b></p> <p>23 <b>of who Emmett Wade is?</b></p> <p>24 A. I do not.</p>
Page 30	<p>1 not to charge Mr. Fletcher.</p> <p>2 THE WITNESS: Can we read the question back,</p> <p>3 please? Could we restate the question?</p> <p>4 (Whereupon, the record was read</p> <p>5 as requested.)</p> <p>6 MR. HOLMES: Same objection.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I do not. I do not have a</p> <p>9 recollection.</p> <p>10 BY MS. WEST:</p> <p>11 <b>Q. I know we -- we talked about this</b></p> <p>12 <b>earlier under "Reason." "No. 2, find" -- and</b></p> <p>13 <b>what you said was "Sheeree Friend"; do you have</b></p> <p>14 <b>an independent recollection of who that</b></p> <p>15 <b>individual is?</b></p> <p>16 A. I do not.</p> <p>17 <b>Q. Do you recall what her involvement was</b></p> <p>18 <b>in the underlying crime?</b></p> <p>19 A. I do not.</p> <p>20 <b>Q. If you listed her -- if she is listed</b></p> <p>21 <b>under reason or you listed her under reason, is</b></p> <p>22 <b>that because she was a witness to the underlying</b></p> <p>23 <b>crime?</b></p> <p>24 MR. COYNE: Objection, foundation.</p>	Page 32	<p>1 <b>Q. Okay. Do you have a recollection of</b></p> <p>2 <b>his involvement in the underlying crime?</b></p> <p>3 A. I do not.</p> <p>4 <b>Q. If individuals were listed under this</b></p> <p>5 <b>reason, for example, "find Sheeree Friend," or</b></p> <p>6 <b>"find Emmett Wade," how would you have obtained</b></p> <p>7 <b>those individuals' names?</b></p> <p>8 MR. COYNE: Objection.</p> <p>9 MR. STARR: Objection, speculation.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't remember authoring this</p> <p>12 document. If you're speaking -- I don't -- I</p> <p>13 don't know how I would have gotten those names.</p> <p>14 BY MS. WEST:</p> <p>15 <b>Q. Okay. And --</b></p> <p>16 A. And it --</p> <p>17 <b>Q. I'm sorry. Go ahead.</b></p> <p>18 A. Are you asking generally?</p> <p>19 <b>Q. Let's ask it this way: So previously</b></p> <p>20 <b>you testified that at the outset you would</b></p> <p>21 <b>review any police reports if it was an in-person</b></p> <p>22 <b>assignment, and you would speak with the</b></p> <p>23 <b>detectives; is that right?</b></p> <p>24 A. Yes.</p>

11 (Pages 29 to 32)



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Page 33	<p>1 <b>Q. Okay. And through reviewing reports</b></p> <p>2 <b>and/or speaking with detectives involved, would</b></p> <p>3 <b>you learn witnesses' names?</b></p> <p>4 A. In the general sense, yes.</p> <p>5 <b>Q. Okay. And just so we are clear here,</b></p> <p>6 <b>you don't have an independent recollection of</b></p> <p>7 <b>learning these two individual -- their names</b></p> <p>8 <b>from either the police reports or the detectives</b></p> <p>9 <b>in this case; is that correct?</b></p> <p>10 A. Correct.</p> <p>11 <b>Q. Number -- point No. 4 where it says,</b></p> <p>12 <b>"run live lineup with Edward Cooper," what does</b></p> <p>13 <b>running a live lineup mean?</b></p> <p>14 MR. COYNE: Objection, foundation. And keep</p> <p>15 in mind the earlier instruction, please.</p> <p>16 BY THE WITNESS:</p> <p>17 A. So generally speaking, running a --</p> <p>18 talking about running a live lineup would mean</p> <p>19 running a lineup with actual people in it, not</p> <p>20 photographs of people. That would be what we</p> <p>21 would talk about with talking about a live</p> <p>22 lineup.</p> <p>23 BY MS. WEST:</p> <p>24 <b>Q. Thank you.</b></p>	Page 35	<p>1 It doesn't come through. I don't know why that</p> <p>2 is.</p> <p>3 MR. COYNE: Okay. Can you put -- that great</p> <p>4 compliment you gave me, can you put that on the</p> <p>5 record, please? Thank you.</p> <p>6 THE WITNESS: Could you restate the question?</p> <p>7 (Whereupon, the record was read</p> <p>8 as requested.)</p> <p>9 BY THE WITNESS:</p> <p>10 A. I do not have an independent</p> <p>11 recollection of why Edward Cooper is listed in</p> <p>12 that box.</p> <p>13 BY MS. WEST:</p> <p>14 <b>Q. Based on the review of this folder,</b></p> <p>15 <b>over where it says "incident" on the left-hand</b></p> <p>16 <b>side, can you tell why Edward Cooper is listed</b></p> <p>17 <b>as a victim?</b></p> <p>18 MR. COYNE: Objection, foundation.</p> <p>19 MR. STARR: Join. Form as well.</p> <p>20 BY THE WITNESS:</p> <p>21 A. So if you could open -- if you could</p> <p>22 put this bigger, because I -- I can't read it.</p> <p>23 BY MS. WEST:</p> <p>24 <b>Q. And it is difficult to see, so do you</b></p>
Page 34	<p>1 <b>Over on the right-hand side of the page</b></p> <p>2 <b>under what -- Victim No. 2.</b></p> <p>3 <b>Do you see where I'm at?</b></p> <p>4 A. Yes.</p> <p>5 <b>Q. Okay. The individual Edward Cooper is</b></p> <p>6 <b>listed.</b></p> <p>7 <b>Do you see that name?</b></p> <p>8 A. I do.</p> <p>9 <b>Q. Okay. Do you recall -- first, do you</b></p> <p>10 <b>recall who Edward Cooper is?</b></p> <p>11 A. I do not have an independent</p> <p>12 recollection of Edward Cooper.</p> <p>13 <b>Q. Do you recall why Edward Cooper is</b></p> <p>14 <b>listed as a victim?</b></p> <p>15 MR. COYNE: Objection, foundation --</p> <p>16 THE COURT REPORTER: I'm sorry. Objection,</p> <p>17 foundation --</p> <p>18 MR. COYNE: I said, Objection, foundation and</p> <p>19 speculation.</p> <p>20 MR. STARR: Join.</p> <p>21 MR. COYNE: Kari, can you hear me, or do you</p> <p>22 need a volume increase?</p> <p>23 THE COURT REPORTER: You know, you're great,</p> <p>24 except for the very beginning of your objection.</p>	Page 36	<p>1 <b>want me to make it any bigger?</b></p> <p>2 A. No. That's fine.</p> <p>3 <b>Q. Okay.</b></p> <p>4 A. So I don't have an independent</p> <p>5 recollection of creating this document and --</p> <p>6 but reading the incident box of this document,</p> <p>7 it appears that the V2 -- which based on how --</p> <p>8 the process of Felony Review folders being</p> <p>9 filled out, Edward Cooper would be V2 on this</p> <p>10 document. According to the incident box, V2 was</p> <p>11 a robbery victim.</p> <p>12 <b>Q. Thank you. All right. Let me just</b></p> <p>13 <b>direct your attention back to the -- the Victim</b></p> <p>14 <b>No. 2 box under "notes."</b></p> <p>15 A. Yes.</p> <p>16 <b>Q. Now, where it says, "tentative ID of</b></p> <p>17 <b>defendant in photo lineup, 13 Feb 02. Not" --</b></p> <p>18 <b>it looks like -- "INV, period, by ASA Walker."</b></p> <p>19 <b>Do you read that the same as I just</b></p> <p>20 <b>read it?</b></p> <p>21 A. Kind of. It's a little -- some of</p> <p>22 lines are missing on the words. It's just a</p> <p>23 little hard for me to see. I'm not -- I'm not</p> <p>24 saying you're wrong, it's just hard for me to</p>

12 (Pages 33 to 36)

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Page 37	<p>1 sec.</p> <p>2 <b>Q. Sure. How about this: Can you read it</b></p> <p>3 <b>for me, for what you think it says?</b></p> <p>4 MR. COYNE: Objection, foundation.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. So I can see, "tentative ID of delta</p> <p>8 in" -- I can't read that word. The next word I</p> <p>9 think is "lineup," and then I see "13" and I see</p> <p>10 "2." And then I see "not" then I -- "INV by</p> <p>11 ASA" -- I think -- "Walker."</p> <p>12 BY MS. WEST:</p> <p>13 <b>Q. Now, just so we are clear, I think you</b></p> <p>14 <b>said this earlier, but you don't have a</b></p> <p>15 <b>recollection of creating this document, but you</b></p> <p>16 <b>think this is your handwriting; is that right?</b></p> <p>17 A. I don't have a recollection of creating</p> <p>18 this document, and it looks like it's my</p> <p>19 handwriting. I don't know; because I didn't --</p> <p>20 I don't remember doing it, I can't say for sure</p> <p>21 that it is my handwriting.</p> <p>22 <b>Q. Okay.</b></p> <p>23 A. Looks like my handwriting.</p> <p>24 <b>Q. Where it says, "next event, ASA" --</b></p>	Page 39	<p>1 A. Generally speaking, it would mean that</p> <p>2 the -- the -- Edward Cooper was not interviewed</p> <p>3 or -- by an ASA and -- so the ASA -- well,</p> <p>4 that's speculation. I don't know. I would</p> <p>5 just -- I know it means that the ASA was -- did</p> <p>6 not interview the -- Cooper.</p> <p>7 BY MS. WEST:</p> <p>8 <b>Q. Okay. So based on this we can</b></p> <p>9 <b>determine that Mr. Cooper gave a tentative</b></p> <p>10 <b>identification on this date, correct?</b></p> <p>11 MR. COYNE: Objection; foundation,</p> <p>12 speculation.</p> <p>13 MR. STARR: Objection to form as well.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I think it's -- it's -- that's -- I can</p> <p>16 say that's what's written on the folder. I</p> <p>17 can't say if that actually happened.</p> <p>18 BY MS. WEST:</p> <p>19 <b>Q. Okay. But it is what's written or</b></p> <p>20 <b>noted on the folder, correct?</b></p> <p>21 A. That's what's written on the folder.</p> <p>22 <b>Q. If upon -- strike that.</b></p> <p>23 <b>Generally speaking, if you were</b></p> <p>24 <b>assigned to a case and you learned that</b></p>
Page 38	<p>1 <b>there is a -- what looks like "J, period,</b></p> <p>2 <b>Walker."</b></p> <p>3 <b>Do you see that?</b></p> <p>4 A. Yes.</p> <p>5 <b>Q. Does that look to be the way you write</b></p> <p>6 <b>your name or did write your name?</b></p> <p>7 A. That looks like it could be my</p> <p>8 handwriting.</p> <p>9 <b>Q. Okay. What does "tentative ID of</b></p> <p>10 <b>defendant" mean?</b></p> <p>11 MR. COYNE: Objection, foundation.</p> <p>12 BY THE WITNESS:</p> <p>13 A. It generally would mean that there was</p> <p>14 a -- the ID -- the identification was tentative.</p> <p>15 BY MS. WEST:</p> <p>16 <b>Q. Meaning, there wasn't a positive</b></p> <p>17 <b>identification; is that right?</b></p> <p>18 A. There wasn't a definite identification.</p> <p>19 <b>Q. Okay. And under that where it says</b></p> <p>20 <b>"not INV by ASA Walker," based on that note,</b></p> <p>21 <b>does that mean you were not involved in the</b></p> <p>22 <b>interview of Mr. Cooper on this date?</b></p> <p>23 MR. COYNE: Objection, foundation.</p> <p>24 BY THE WITNESS:</p>	Page 40	<p>1 <b>witnesses had already been spoken to, would you</b></p> <p>2 <b>document that on the Felony Review folder sheet?</b></p> <p>3 MR. STARR: Form, foundation. Calls for</p> <p>4 speculation.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Witnesses were spoken to by whom?</p> <p>7 BY MS. WEST:</p> <p>8 <b>Q. Let me try it this way: Based on the</b></p> <p>9 <b>note that you have in front of you relative to</b></p> <p>10 <b>Mr. Cooper, can you tell who spoke with</b></p> <p>11 <b>Mr. Cooper on February 13, 2002?</b></p> <p>12 MR. COYNE: Objection, foundation.</p> <p>13 MR. STARR: Join.</p> <p>14 BY THE WITNESS:</p> <p>15 A. So this -- this document that I don't</p> <p>16 remember creating but has handwriting that looks</p> <p>17 like mine does not indicate who -- who spoke</p> <p>18 with Edward Cooper.</p> <p>19 BY MS. WEST:</p> <p>20 <b>Q. Okay. Can you tell based on the note</b></p> <p>21 <b>regarding Mr. Cooper that you, ASA Walker, did</b></p> <p>22 <b>not speak with him on February 13, 2002?</b></p> <p>23 MR. COYNE: Objection; foundation,</p> <p>24 speculation.</p>

13 (Pages 37 to 40)

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Page 41	<p>1 MR. STARR: Join.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I don't know -- I know the folder</p> <p>4 says -- I know what the folder says that we</p> <p>5 talked about. I don't know what that -- I don't</p> <p>6 know how that translates in the real world. I</p> <p>7 don't have an independent recollection of this.</p> <p>8 BY MS. WEST:</p> <p>9 Q. All right. I'm going to show you</p> <p>10 what's Bates-stamped 3015, which is page 2 of</p> <p>11 the document. Actually, you know what? Let's</p> <p>12 back up just to put this in some context really</p> <p>13 quick. I'm going to go back to that first page</p> <p>14 that we looked at --</p> <p>15 A. Okay.</p> <p>16 Q. -- 3018. At the top, does it appear to</p> <p>17 be dated February 13, '02?</p> <p>18 A. At the top of the page it says, "13</p> <p>19 February 02," yes.</p> <p>20 Q. Okay. And then if you go on over</p> <p>21 just -- it says pages -- or page 1 of 1.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Now, let me take you back up to</p>	Page 43	<p>1 But since I don't have an independent</p> <p>2 recollection of creating it, I cannot say that</p> <p>3 it was -- I cannot say that I know when it was</p> <p>4 created, because I -- I don't remember.</p> <p>5 BY MS. WEST:</p> <p>6 Q. Sure. And earlier you told me that you</p> <p>7 took apart the documents and put it in a</p> <p>8 different order.</p> <p>9 Is that because you put it in date</p> <p>10 order?</p> <p>11 A. I -- I -- so when I was preparing for</p> <p>12 my deposition after receiving documents from my</p> <p>13 attorney's office, I -- there was pages in</p> <p>14 between, and it -- and it kind of got messed up</p> <p>15 on our copy machine when I printed them all out.</p> <p>16 So, yes, so I -- so when I put these</p> <p>17 together, I put the -- the pages that said</p> <p>18 13 February 02 together in a packet. And, you</p> <p>19 know, for the other similar-looking pages, I</p> <p>20 grouped them together by what the date was at</p> <p>21 the top of the page.</p> <p>22 Q. Okay. Thank you.</p> <p>23 And typically, when you were filling</p> <p>24 out this -- this Felony Review sheet folder, if</p>
Page 42	<p>1 page 2 of the document, which is 3015 Bates</p> <p>2 stamp.</p> <p>3 Do you see the top is -- also is dated</p> <p>4 February 13, '02?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And it says, "page 2 of 2."</p> <p>7 Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Is this page done on the same day as</p> <p>10 what we just looked at on 3018?</p> <p>11 A. Well --</p> <p>12 MR. COYNE: Objection, foundation --</p> <p>13 MR. HOLMES: Objection -- go ahead, John.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I didn't --</p> <p>16 MR. COYNE: Objection, foundation.</p> <p>17 Go ahead.</p> <p>18 MR. STARR: Join.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I don't remember creating this</p> <p>21 document. I know the date on the -- on the --</p> <p>22 what -- I will call it the first page that you</p> <p>23 showed me is the same as the -- as this -- as</p> <p>24 this document.</p>	Page 44	<p>1 you had more than one entry on the same date,</p> <p>2 would you document which page it was for that</p> <p>3 date at the top?</p> <p>4 A. If I needed -- when I was on Felony</p> <p>5 Review and I was filling out Felony Review</p> <p>6 folders, if I needed multiple folders for the --</p> <p>7 that date's -- for lack of a better word --</p> <p>8 work, I would date each folder at the top.</p> <p>9 Q. On the left-hand side of this folder,</p> <p>10 do you see there is a "CI" under "action"?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And next to it under "reason,"</p> <p>13 there is items -- what appear to look like</p> <p>14 5 and 6.</p> <p>15 Do you see those?</p> <p>16 A. I see a 5 and 6, yes.</p> <p>17 Q. Okay. Can you read those, please?</p> <p>18 A. "5, INV Edward Cooper. 6, double-check</p> <p>19 that D -- or delta -- equal sign crossed with a</p> <p>20 slash, in custody."</p> <p>21 Q. And just for the record, "INV," the</p> <p>22 shorthand, does that stand for investigate?</p> <p>23 A. When I was on Felony Review, typically</p> <p>24 INV meant interview.</p>

14 (Pages 41 to 44)



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Page 45	<p>1 <b>Q. And under No. 6, the equal with a slash</b></p> <p>2 <b>through it, do you know what that's shorthand</b></p> <p>3 <b>for?</b></p> <p>4 A. Typically, when I see that I think it</p> <p>5 means not or doesn't.</p> <p>6 <b>Q. Over on the right-hand side under</b></p> <p>7 <b>Witness 1, do you see that Terry Rogers is</b></p> <p>8 <b>listed as Witness No. 1?</b></p> <p>9 A. Yes.</p> <p>10 <b>Q. And he is listed as an eyewitness; is</b></p> <p>11 <b>that right?</b></p> <p>12 A. In the -- the -- I see the word "eye,"</p> <p>13 yes. That would typically mean -- generally</p> <p>14 would mean eyewitness.</p> <p>15 <b>Q. Okay. And then going down a few boxes</b></p> <p>16 <b>where it says, "related to defendant," do you</b></p> <p>17 <b>see that?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Okay. Can you read what it says next</b></p> <p>20 <b>to that?</b></p> <p>21 A. "Did time, something, delta in</p> <p>22 Stateville."</p> <p>23 <b>Q. Okay. And delta stands for defendant,</b></p> <p>24 <b>correct?</b></p>	Page 47	<p>1 <b>you obtain that information for the individual</b></p> <p>2 <b>witness?</b></p> <p>3 MR. STARR: Objection to form, foundation.</p> <p>4 MR. COYNE: Join.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Generally speaking, while I was on</p> <p>7 Felony Review, there could be multiple ways I</p> <p>8 would get that information.</p> <p>9 BY MS. WEST:</p> <p>10 <b>Q. And what would --</b></p> <p>11 A. If I was filling -- if I was filling</p> <p>12 out one of these boxes, there is -- there's</p> <p>13 multiple ways I could -- I would have gotten</p> <p>14 that -- I could have gotten that information.</p> <p>15 <b>Q. And what are those multiple ways?</b></p> <p>16 A. Well, they would include speaking with</p> <p>17 the detectives or officers involved. It could</p> <p>18 be information that was already written on a</p> <p>19 police report. It could be from speaking to a</p> <p>20 witness. And I'm sure there is other ways too,</p> <p>21 but those would -- those three ways would be the</p> <p>22 most common.</p> <p>23 <b>Q. Would there -- strike that.</b></p> <p>24 <b>Would you ever run an IDOC history for</b></p>
Page 46	<p>1 A. Generally -- generally, yes.</p> <p>2 <b>Q. Okay. Do you recall speaking with</b></p> <p>3 <b>Mr. Rogers?</b></p> <p>4 A. I do not.</p> <p>5 <b>Q. Okay. This information that's</b></p> <p>6 <b>documented here regarding -- related to</b></p> <p>7 <b>defendant, would that have been information that</b></p> <p>8 <b>was learned directly from the witness or</b></p> <p>9 <b>Mr. Rogers in this case?</b></p> <p>10 MR. STARR: Objection to form.</p> <p>11 MR. COYNE: Objection; foundation,</p> <p>12 speculation.</p> <p>13 MR. STARR: Join.</p> <p>14 THE WITNESS: Could you repeat the question,</p> <p>15 please?</p> <p>16 (Whereupon, the record was read</p> <p>17 as requested.)</p> <p>18 BY THE WITNESS:</p> <p>19 A. I don't remember creating this</p> <p>20 document. I can't answer without speculating.</p> <p>21 BY MS. WEST:</p> <p>22 <b>Q. Generally, all the information that's</b></p> <p>23 <b>listed under Witness No. 1; so the name, the</b></p> <p>24 <b>address, the phone number, typically, where do</b></p>	Page 48	<p>1 <b>an individual witness?</b></p> <p>2 MR. STARR: Form; foundation, speculation.</p> <p>3 MR. COYNE: Join.</p> <p>4 BY THE WITNESS:</p> <p>5 A. I don't -- in 2- -- so when I was on</p> <p>6 review and it was 22 years ago, we did not have</p> <p>7 a lot of access to the internet. There were</p> <p>8 times when I was at the police station where no</p> <p>9 one in the room had access to the internet. I</p> <p>10 don't remember running an IDOC history for a</p> <p>11 witness, me personally myself.</p> <p>12 BY MS. WEST:</p> <p>13 <b>Q. Down under "notes," can you read what</b></p> <p>14 <b>that says? And I can make it bigger, if that's</b></p> <p>15 <b>helpful.</b></p> <p>16 A. Yeah. There is a lot of -- of extra</p> <p>17 black on this, so it makes things a little more</p> <p>18 difficult to see. There is something in a</p> <p>19 circle that says -- and then "ASA Walker on</p> <p>20 13 Feb 02. Something in a circle, delta in</p> <p>21 photo lineup on 13 Feb 02, oral, scribble, only</p> <p>22 - no grand jury per ASA O'Brien."</p> <p>23 <b>Q. The circle over on the left-hand side,</b></p> <p>24 <b>it has something inside of it.</b></p>

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Page 49	<p>1           <b>Was there ever an instance that -- when</b></p> <p>2           <b>you were on Felony Review that you would write</b></p> <p>3           <b>an "I" and circle it?</b></p> <p>4           A. Yes.</p> <p>5           <b>Q. And what does that stand for?</b></p> <p>6           A. Typically, when I was on Felony Review</p> <p>7           if I wrote "I" in a circle, it could also mean</p> <p>8           interview.</p> <p>9           <b>Q. Can you tell from the notes here if</b></p> <p>10          <b>that's an "I" with a circle around it?</b></p> <p>11          MR. STARR: Asked and answered.</p> <p>12          BY THE WITNESS:</p> <p>13          A. I -- I can't tell for sure, because</p> <p>14          there is some bad copy noise on this. It's -- I</p> <p>15          can't say for sure.</p> <p>16          BY MS. WEST:</p> <p>17          <b>Q. Okay. What does the significance of</b></p> <p>18          <b>no -- like, what does "no grand jury" mean?</b></p> <p>19          MR. COYNE: Objection; foundation,</p> <p>20          speculation.</p> <p>21          THE WITNESS: Could I talk to John about</p> <p>22          something, please?</p> <p>23          MR. COYNE: Sure. I will be off the record</p> <p>24          for a moment.</p>	Page 51	<p>1           witness, my instruction to you, Jennifer, is a</p> <p>2           question. First of all, can you answer that</p> <p>3           question without implicating the mental</p> <p>4           impressions and decision-making of you and your</p> <p>5           fellow prosecutors with respect to decisions on</p> <p>6           how to utilize the grand jury resource in making</p> <p>7           prosecutor decisions?</p> <p>8           THE WITNESS: No, I cannot.</p> <p>9           MR. COYNE: All right. Then, I would</p> <p>10          instruct you not to answer the question on work</p> <p>11          product. Mr. Holmes may have a similar</p> <p>12          instruction on grand -- on the deliberative</p> <p>13          process.</p> <p>14          MR. HOLMES: Same instruction on behalf of</p> <p>15          the State's Attorney's Office on grounds of</p> <p>16          deliberative process privilege, yes.</p> <p>17          BY MS. WEST:</p> <p>18          <b>Q. Okay. What is -- strike that.</b></p> <p>19          <b>When a witness is spoken to on a</b></p> <p>20          <b>particular date, are they documented on the</b></p> <p>21          <b>Felony Review folder as a witness?</b></p> <p>22          MR. COYNE: Objection; foundation, incomplete</p> <p>23          hypothetical.</p> <p>24</p>
Page 50	<p>1           (Whereupon, a discussion was had</p> <p>2           off the record.)</p> <p>3           (Whereupon, the record was read</p> <p>4           as requested.)</p> <p>5           MS. WEST: Did we get an answer to that or</p> <p>6           no?</p> <p>7           THE COURT REPORTER: No.</p> <p>8           THE WITNESS: No.</p> <p>9           MR. COYNE: No. The witness requested --</p> <p>10          THE WITNESS: You didn't get an answer.</p> <p>11          MR. COYNE: The witness has requested a</p> <p>12          conference with counsel.</p> <p>13          MS. WEST: That's fine. Thank you.</p> <p>14          MR. COYNE: For the record, the witness</p> <p>15          requested a break to confer with counsel</p> <p>16          regarding a pending question, so we are just</p> <p>17          going to ask that the question be repeated to</p> <p>18          begin.</p> <p>19          (Whereupon, the record was read</p> <p>20          as requested.)</p> <p>21          <b>Q. Okay. What does the</b></p> <p>22          <b>significance of no -- like,</b></p> <p>23          <b>what does "no grand jury" mean?</b></p> <p>24          MR. COYNE: All right. On behalf of the</p>	Page 52	<p>1           BY THE WITNESS:</p> <p>2           A. Generally speaking, if a witness is</p> <p>3           spoken to by an ASA, there may be notes or</p> <p>4           documentations made on the Felony Review folder.</p> <p>5           BY MS. WEST:</p> <p>6           <b>Q. Is there ever an instance where you</b></p> <p>7           <b>would write down a witness when they weren't</b></p> <p>8           <b>spoken to by an ASA?</b></p> <p>9           MR. COYNE: Objection, foundation.</p> <p>10          MR. STARR: Join.</p> <p>11          BY THE WITNESS:</p> <p>12          A. It's possible. It's -- I don't -- I --</p> <p>13          it's hard to answer that question. I -- it's</p> <p>14          possible.</p> <p>15          BY MS. WEST:</p> <p>16          <b>Q. What does -- on that notation on 3015,</b></p> <p>17          <b>what does "oral only" mean?</b></p> <p>18          MR. COYNE: Same instruction as previously</p> <p>19          given, Jennifer, as to work product.</p> <p>20          MR. HOLMES: And as to the Office as to</p> <p>21          deliberative process privilege.</p> <p>22          BY THE WITNESS:</p> <p>23          A. Generally, that would mean that an oral</p> <p>24          conversation took place.</p>

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Page 53	<p>1 BY MS. WEST:</p> <p>2 <b>Q. Based on the no entry here with regard</b></p> <p>3 <b>to Mr. Rogers, can you tell whether or not</b></p> <p>4 <b>Mr. Rogers gave a positive identification of the</b></p> <p>5 <b>defendant based on the photo lineup on</b></p> <p>6 <b>February 13, 2002?</b></p> <p>7 MR. COYNE: Objection; foundation,</p> <p>8 speculation.</p> <p>9 Allyson, could you just bring that</p> <p>10 document up? Because that's one I don't have in</p> <p>11 front of me.</p> <p>12 MS. WEST: Sure.</p> <p>13 MR. STARR: And I will join that objection as</p> <p>14 well.</p> <p>15 MR. COYNE: Thank you.</p> <p>16 BY THE WITNESS:</p> <p>17 A. So as I stated before, I don't remember</p> <p>18 creating this document. Even though the</p> <p>19 handwriting on this document looks like my</p> <p>20 handwriting, there is -- there is a squiggle to</p> <p>21 the left of the word "delta" where -- in the</p> <p>22 line that says, "delta in photo lineup." I</p> <p>23 can't read that squiggle due to the -- kind of</p> <p>24 the copy noise.</p>	Page 55	<p>1 a number of grand jury-related documents, which</p> <p>2 have been produced in this case. I have not had</p> <p>3 an opportunity to read an order from the</p> <p>4 criminal court judge authorizing release of such</p> <p>5 documents.</p> <p>6 I implicitly assume that there has been</p> <p>7 such an order. Although, I would note that the</p> <p>8 Office does take the position that the</p> <p>9 strictures of the statute are to be abided by</p> <p>10 its attorneys, and thus, that would constrain</p> <p>11 ASA Walker's responses to questions about this</p> <p>12 document unless, there is an order from Judge</p> <p>13 Reddick or another judge at 26th and California,</p> <p>14 which would authorize release of information</p> <p>15 pertaining these grand jury proceedings that I</p> <p>16 am not aware of.</p> <p>17 MR. COYNE: Let me just ask -- Jennifer, I</p> <p>18 would -- on behalf of the witness, I would join</p> <p>19 that -- join that instruction and that</p> <p>20 admonition.</p> <p>21 Jennifer, can I just ask, did you have</p> <p>22 any role in the grand jury in this case, just</p> <p>23 for my purposes to represent you?</p> <p>24 THE WITNESS: I did not.</p>
Page 54	<p>1 So I'm not -- I don't know -- I can't</p> <p>2 answer that question, because I'm having trouble</p> <p>3 reading this document.</p> <p>4 BY MS. WEST:</p> <p>5 <b>Q. Okay. Do you have an independent</b></p> <p>6 <b>recollection of Terry Rogers giving a positive</b></p> <p>7 <b>identification of Mr. Fletcher based off of a</b></p> <p>8 <b>photo array?</b></p> <p>9 A. I do not.</p> <p>10 <b>Q. Let's go to the next page, which for</b></p> <p>11 <b>the record is 3016 or page -- I think page 3 of</b></p> <p>12 <b>this document. Yes.</b></p> <p>13 <b>And it has a page that looks like there</b></p> <p>14 <b>is a stamp on it. It says, "filed grand</b></p> <p>15 <b>jury" and what looks like "May 13, 2002."</b></p> <p>16 <b>Do you see that?</b></p> <p>17 A. I see the stamp on the screen, yes.</p> <p>18 <b>Q. Any idea what -- where that came from</b></p> <p>19 <b>or what that is?</b></p> <p>20 A. I have --</p> <p>21 MR. HOLMES: I just -- on behalf of the</p> <p>22 Office I will just offer that 725 ILCS 5/112-6</p> <p>23 is a statute which protects the secrecy of grand</p> <p>24 jury proceedings. I do recognize that there are</p>	Page 56	<p>1 MR. COYNE: Okay. Thank you.</p> <p>2 MS. WEST: Okay.</p> <p>3 THE WITNESS: That I can -- I don't -- no. I</p> <p>4 did not.</p> <p>5 MS. WEST: Okay. And just for the record --</p> <p>6 let me stop this for a second.</p> <p>7 Just for the record, Sean, do we have</p> <p>8 an order in this case?</p> <p>9 MR. STARR: Not to my knowledge.</p> <p>10 MS. WEST: Okay. Can your office --</p> <p>11 MR. STARR: But that doesn't mean --</p> <p>12 MS. WEST: I'm sorry. Go ahead.</p> <p>13 MR. STARR: I'm sorry. I'm not saying that</p> <p>14 we don't have one. You know, I joined the case</p> <p>15 quite late. I'm not aware of one as I sit here</p> <p>16 today.</p> <p>17 MS. WEST: Okay. But just so we are clear --</p> <p>18 because that's why I think there is an existence</p> <p>19 of an order, because your office did produce the</p> <p>20 grand jury materials.</p> <p>21 MR. STARR: Yeah. And I agree with that.</p> <p>22 MS. WEST: Okay. I just wanted to confirm</p> <p>23 with you. Okay. Thank you.</p> <p>24 MR. COYNE: When you say your office, do you</p>

17 (Pages 53 to 56)

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Page 57	<p>1 mean Loevy's office or --</p> <p>2 MS. WEST: Correct.</p> <p>3 MR. COYNE: Oh, got you.</p> <p>4 MS. WEST: Loevy's office produced the grand</p> <p>5 jury materials, the two statements that I</p> <p>6 provided to you guys prior to today's</p> <p>7 deposition.</p> <p>8 MR. COYNE: Okay.</p> <p>9 MR. STARR: And, Allyson, if you want, I can</p> <p>10 look on a break to see if we have the order.</p> <p>11 MS. WEST: Awesome. Thank you. I can take a</p> <p>12 look too.</p> <p>13 MR. STARR: I mean, yeah, it would have been</p> <p>14 produced, but, yeah, I'll take a look.</p> <p>15 MS. WEST: Okay. Thanks.</p> <p>16 BY MS. WEST:</p> <p>17 <b>Q. Did we even get an answer to the</b></p> <p>18 <b>question after --</b></p> <p>19 A. If you could repeat the question about</p> <p>20 the stamp?</p> <p>21 <b>Q. Sure.</b></p> <p>22 <b>So on that page 3016 -- it looks like</b></p> <p>23 <b>it's a stamped document.</b></p> <p>24 <b>Any idea what that stamp is?</b></p>	Page 59	<p>1 <b>that right?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. Okay.</b></p> <p>4 A. Correct.</p> <p>5 <b>Q. Do you know what those -- those</b></p> <p>6 <b>preprinted abbreviations mean?</b></p> <p>7 MR. COYNE: Objection, foundation.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Those are abbreviations used typically</p> <p>10 in bond court by the State's Attorney's Office.</p> <p>11 Those --</p> <p>12 BY MS. WEST:</p> <p>13 <b>Q. Have you -- sorry. Go ahead.</b></p> <p>14 A. Generally, it's my understanding it</p> <p>15 means -- the FPC, finding probable cause. The G</p> <p>16 is an abbreviation for granted. ATIA I believe</p> <p>17 means advise trial in abstentia. DDT means</p> <p>18 defendant demands trial. M/S refers to motion</p> <p>19 state.</p> <p>20 <b>Q. Okay. Thank you.</b></p> <p>21 <b>And there is no date on here to</b></p> <p>22 <b>indicate that any of that -- those things that</b></p> <p>23 <b>you just read happened on a particular date; is</b></p> <p>24 <b>that right?</b></p>
Page 58	<p>1 A. I don't know. I don't know.</p> <p>2 <b>Q. Thank you.</b></p> <p>3 <b>The next page -- sorry. I will pull it</b></p> <p>4 <b>back up. The next page on this document, which</b></p> <p>5 <b>is page 4 of the document or for the Bates it's</b></p> <p>6 <b>3017, on that page, Ms. Walker, do you see that</b></p> <p>7 <b>there is some abbreviations under "motions and</b></p> <p>8 <b>rulings"?</b></p> <p>9 A. Oh, yeah.</p> <p>10 <b>Q. Okay. And first off, do you know what</b></p> <p>11 <b>this particular page of the document is? Are</b></p> <p>12 <b>you familiar with it?</b></p> <p>13 A. So, generally speaking, that is a --</p> <p>14 the outside of the Felony -- of a Felony Review</p> <p>15 folder that has minimal writing on it. I don't</p> <p>16 remember creating this document. Although, the</p> <p>17 words "Fletcher, comma, James," that looks like</p> <p>18 it could be my writing. The items that you're</p> <p>19 talking about, Counsel, are part of the</p> <p>20 preprinted form. The pre -- it comes like that.</p> <p>21 It's how it was created, and those -- that's --</p> <p>22 that's preprinted on the -- on the document.</p> <p>23 <b>Q. So those abbreviations under "motions</b></p> <p>24 <b>and rulings" are preprinted on that document; is</b></p>	Page 60	<p>1 A. There is no other writing on the folder</p> <p>2 other than the "Fletcher, comma, James."</p> <p>3 <b>Q. Thank you. All right. So moving</b></p> <p>4 <b>forward, let's take a look at 3020. All right.</b></p> <p>5 <b>And the date of this is March 9, 2002.</b></p> <p>6 <b>Do you see that?</b></p> <p>7 A. Yes.</p> <p>8 <b>Q. Okay. Are you able to pull it up</b></p> <p>9 <b>either in front of you on a paper copy or do</b></p> <p>10 <b>you --</b></p> <p>11 A. Yeah. I have the paper copy -- I am</p> <p>12 just trying to find my paper copy and make sure</p> <p>13 I'm looking at the right thing.</p> <p>14 MR. STARR: Allyson, if I may, could I ask</p> <p>15 you to make it a little bit bigger for my --</p> <p>16 MS. WEST: Sure, sure.</p> <p>17 MR. STARR: Thank you.</p> <p>18 BY MS. WEST:</p> <p>19 <b>Q. Ms. Walker, tell me whenever you've</b></p> <p>20 <b>been able to locate the page.</b></p> <p>21 A. Yes. I have located the page.</p> <p>22 <b>Q. Okay. Okay. Great. All right. I'm</b></p> <p>23 <b>going to direct you -- and I will make it bigger</b></p> <p>24 <b>for everybody involved here. I'm going to</b></p>

18 (Pages 57 to 60)

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Page 61	<p>1 direct you to the right-hand side of the page</p> <p>2 where it has Witness No. 2.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. All right. And the individual</p> <p>6 listed as Witness No. 2 is Sheene Friend.</p> <p>7 Do you see that?</p> <p>8 A. Yes. I see the see the words "Sheene</p> <p>9 Friend," yes.</p> <p>10 Q. Okay. Going on down, do you see on the</p> <p>11 left-hand side where it says, "means of ID"?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And it looks like there is a</p> <p>14 circle around "photo array."</p> <p>15 Do you see that?</p> <p>16 A. I see that on the document.</p> <p>17 Q. Okay. Because the photo array is</p> <p>18 circled, does that mean that Ms. Friend was</p> <p>19 shown a photo array at some point in time?</p> <p>20 MR. COYNE: Objection, foundation.</p> <p>21 BY THE WITNESS:</p> <p>22 A. So while -- I don't have an independent</p> <p>23 recollection of creating this document.</p> <p>24 Although, the handwriting on this document looks</p>	Page 63	<p>1 9 Mar 02."</p> <p>2 Do you see that?</p> <p>3 A. Yes. I see that.</p> <p>4 Q. Okay. And do you agree with what I</p> <p>5 just read, that that's what's documented here?</p> <p>6 A. That -- the copy is not great, but that</p> <p>7 looks like that's what it could say.</p> <p>8 Q. Okay. And the "I" you previously</p> <p>9 testified means interview; is that right?</p> <p>10 A. Generally speaking, "I" with a circle</p> <p>11 would mean interview.</p> <p>12 Q. Okay. And based on these notes, it</p> <p>13 appears that you, ASA Walker, interviewed</p> <p>14 Ms. Friend on March 9th, 2002; is that right?</p> <p>15 A. I don't have any independent</p> <p>16 recollection of this, so -- so I can't say for</p> <p>17 sure.</p> <p>18 Q. Do you have any reason to dispute or</p> <p>19 disagree with what is documented here in front</p> <p>20 of you with regard to the interview of</p> <p>21 Ms. Friend?</p> <p>22 MR. COYNE: Objection, form.</p> <p>23 MR. STARR: Form, foundation, speculation.</p> <p>24 BY THE WITNESS:</p>
Page 62	<p>1 like it could be my handwriting. I don't know</p> <p>2 why the circle was placed around "photo array"</p> <p>3 here. But generally speaking, if someone was</p> <p>4 shown a photo array, that would be -- you know,</p> <p>5 generally, we would circle "photo array."</p> <p>6 BY MS. WEST:</p> <p>7 Q. Okay. And "statement type," it looks</p> <p>8 like "handwritten" is circled.</p> <p>9 Do you see that?</p> <p>10 A. I do see that.</p> <p>11 Q. Okay. Is that because Ms. Friend gave</p> <p>12 a handwritten statement?</p> <p>13 MR. COYNE: Objection, foundation.</p> <p>14 BY THE WITNESS:</p> <p>15 A. Again, I don't remember creating this</p> <p>16 document, though the handwriting looks like</p> <p>17 mine. Generally speaking, if a handwritten was</p> <p>18 taken, the handwritten -- the word "handwritten"</p> <p>19 would be circled.</p> <p>20 BY MS. WEST:</p> <p>21 Q. Okay. And down under "Notes" -- let me</p> <p>22 make it a little bit bigger, because I think</p> <p>23 this one is pretty hard to read -- it looks like</p> <p>24 it says "I," with a circle, "by ASA Walker on</p>	Page 64	<p>1 A. I don't have an independent</p> <p>2 recollection. So I can't say -- I can't say</p> <p>3 that I know -- I know that to be true, because</p> <p>4 it would be speculation.</p> <p>5 BY MS. WEST:</p> <p>6 Q. On down on that line -- the next</p> <p>7 line -- I'm sorry. On the same line under</p> <p>8 notes, it looks like there is a plus sign with</p> <p>9 an "ID," and it's circled.</p> <p>10 Do you see that?</p> <p>11 A. I do see that.</p> <p>12 Q. And what does that mean to you?</p> <p>13 A. It's -- it's -- "ID" with a circle</p> <p>14 around it and a plus sign generally speaking</p> <p>15 could mean that there was a positive ID. But</p> <p>16 after that, I can't -- the words are too light,</p> <p>17 so I can't read what it says. So I'm not -- I'm</p> <p>18 not sure.</p> <p>19 Q. Do you have an independent recollection</p> <p>20 of Ms. Friend making a positive identification</p> <p>21 based on a photo lineup?</p> <p>22 A. I do not.</p> <p>23 Q. Based on the notes that are in front of</p> <p>24 you, can you say that Ms. Friend made a positive</p>



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Page 65	<p>1 <b>identification based on a photo array?</b></p> <p>2 MR. COYNE: Objection --</p> <p>3 MR. STARR: Form, foundation.</p> <p>4 MR. COYNE: -- foundation.</p> <p>5 MR. STARR: Form, foundation, speculation.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I can't -- I don't remember creating</p> <p>8 this document. Although, the handwriting does</p> <p>9 appear that it could -- it looks like mine.</p> <p>10 Because I don't have an independent</p> <p>11 recollection, I cannot say that.</p> <p>12 BY MS. WEST:</p> <p>13 <b>Q. Is there any other reason why a photo</b></p> <p>14 <b>array would be circled if the individual didn't</b></p> <p>15 <b>view a photo array?</b></p> <p>16 MR. COYNE: Objection; foundation,</p> <p>17 speculation.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I don't know.</p> <p>20 BY MS. WEST:</p> <p>21 <b>Q. And is there any other reason why</b></p> <p>22 <b>"positive ID" would be documented if the witness</b></p> <p>23 <b>didn't positively identify an individual?</b></p> <p>24 MR. COYNE: Same objections.</p>	Page 67	<p>1 and there are no pictures attached to it.</p> <p>2 BY MS. WEST:</p> <p>3 <b>Q. Okay. If you don't mind -- I'm sorry.</b></p> <p>4 A. Just so everybody knows.</p> <p>5 <b>Q. Okay. Thank you. I may ask you some</b></p> <p>6 <b>questions about those photographs. So if you'd</b></p> <p>7 <b>prefer, we can look off of this one, but the</b></p> <p>8 <b>statement itself should be identical, if you --</b></p> <p>9 <b>it's better to read the copy in front of you.</b></p> <p>10 <b>Okay. All right. So we have already</b></p> <p>11 <b>established you have what we have marked as</b></p> <p>12 <b>Exhibit 2 in front of you.</b></p> <p>13 <b>Do you recognize this document?</b></p> <p>14 A. I do not.</p> <p>15 <b>Q. Okay. Do you see the top where it</b></p> <p>16 <b>says, "Statement of Sheene Friend"?</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. Okay. Is that in your handwriting, the</b></p> <p>19 <b>name "Sheene Friend"?</b></p> <p>20 A. It looks like it could be my</p> <p>21 handwriting, but I don't have an independent</p> <p>22 recollection of creating this document, so I</p> <p>23 can't say that it is.</p> <p>24 <b>Q. Okay. If you go on down where it says</b></p>
Page 66	<p>1 MR. STARR: Join.</p> <p>2 BY THE WITNESS:</p> <p>3 A. Because I don't have a recollection of</p> <p>4 this, I can't answer.</p> <p>5 BY MS. WEST:</p> <p>6 <b>Q. Let me show you what we will mark as</b></p> <p>7 <b>Exhibit 2. And it's going to be the handwritten</b></p> <p>8 <b>statement of Ms. Friend.</b></p> <p>9 <b>Do you have that in paper form?</b></p> <p>10 A. I do.</p> <p>11 (Whereupon, Walker Deposition</p> <p>12 Exhibit No. 2 was marked for</p> <p>13 identification.)</p> <p>14 MS. WEST: Okay. All right. Great. I will</p> <p>15 pull it up anyway for counsel.</p> <p>16 MR. COYNE: Can I just ask, are these going</p> <p>17 to be Walker deposition exhibits, or are these</p> <p>18 previously marked?</p> <p>19 MS. WEST: No. These are going to be Walker</p> <p>20 deposition exhibits. So this is No. 2. And for</p> <p>21 the record, it is City-JF-000040 through 46.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Just so -- so the copy that I got of</p> <p>24 this document doesn't have that city mark on it,</p>	Page 68	<p>1 <b>"present," do you see "ASA Jennifer Walker"?</b></p> <p>2 A. I do see that.</p> <p>3 <b>Q. Okay. Is that in your handwriting?</b></p> <p>4 A. Yes. It -- it looks like it could be</p> <p>5 my handwriting. I don't have an independent</p> <p>6 recollection of creating this document, so I</p> <p>7 cannot say that for sure it is.</p> <p>8 <b>Q. Okay. So listed on this document --</b></p> <p>9 <b>present for the statement of Ms. Friend is</b></p> <p>10 <b>listed, ASA Jennifer Walker, Detective Bogucki,</b></p> <p>11 <b>and Detective Schalk.</b></p> <p>12 <b>Do you see that?</b></p> <p>13 A. I see the document says that.</p> <p>14 <b>Q. Do you have an independent recollection</b></p> <p>15 <b>of taking the handwritten statement of</b></p> <p>16 <b>Ms. Friend?</b></p> <p>17 A. I do not.</p> <p>18 <b>Q. Based on the statement that's in front</b></p> <p>19 <b>of you, where was the statement taken?</b></p> <p>20 A. Because I don't have an independent</p> <p>21 recollection, I don't know where the statement</p> <p>22 was taken, but the document indicates Area 5.</p> <p>23 <b>Q. And the document indicates that it was</b></p> <p>24 <b>taken on March 9, 2002, at 13:50; is that right?</b></p>

20 (Pages 65 to 68)

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Page 69	<p>1 A. Yes.</p> <p>2 <b>Q. Can you tell based on this document --</b></p> <p>3 <b>strike that.</b></p> <p>4 <b>I'm going to go down just to the body</b></p> <p>5 <b>of the document itself.</b></p> <p>6 <b>The first sentence, "After being</b></p> <p>7 <b>advised that Assistant State's Attorney Jennifer</b></p> <p>8 <b>Walker is a lawyer and is a prosecutor and not</b></p> <p>9 <b>her lawyer..." I'm just going to stop there for</b></p> <p>10 <b>a second.</b></p> <p>11 <b>Based on that -- based on the document</b></p> <p>12 <b>and the sentence that I just read, did you</b></p> <p>13 <b>advise Ms. Friend that you were an assistant</b></p> <p>14 <b>state's attorney and not her lawyer?</b></p> <p>15 MR. STARR: Form, foundation. Calls for</p> <p>16 speculation.</p> <p>17 MR. COYNE: Join.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I don't have a specific recollection of</p> <p>20 taking this handwritten statement or creating</p> <p>21 this document, but the document -- that's what</p> <p>22 the document says.</p> <p>23 BY MS. WEST:</p> <p>24 <b>Q. Would there ever be an instance where</b></p>	Page 71	<p>1 A. Because I don't remember creating this</p> <p>2 document, and I -- I don't remember taking the</p> <p>3 statement that's discussed in this document.</p> <p>4 <b>Q. Typically, when you would take a</b></p> <p>5 <b>handwritten statement, would you document that</b></p> <p>6 <b>you were present for the statement?</b></p> <p>7 A. Generally speaking, yes.</p> <p>8 <b>Q. And typically, when you were taking a</b></p> <p>9 <b>handwritten statement, would you document that</b></p> <p>10 <b>you advised the witness of who you were?</b></p> <p>11 A. Generally speaking, yes.</p> <p>12 <b>Q. I'm going to ask you to take a look</b></p> <p>13 <b>at -- starting on the third page of this</b></p> <p>14 <b>document --</b></p> <p>15 MR. COYNE: Is that BS 42?</p> <p>16 MS. WEST: I'm sorry?</p> <p>17 MR. COYNE: Is that BS 42, the third page,</p> <p>18 Bates stamp?</p> <p>19 MS. WEST: Correct.</p> <p>20 MR. COYNE: Thank you.</p> <p>21 MS. WEST: 42 Bates stamp, the third page of</p> <p>22 the document itself.</p> <p>23 BY MS. WEST:</p> <p>24 <b>Q. The middle of the page -- I'm going to</b></p>
Page 70	<p>1 <b>somebody else would take down a handwritten</b></p> <p>2 <b>statement and indicate that it was you that was</b></p> <p>3 <b>present?</b></p> <p>4 MR. COYNE: Objection; form, foundation.</p> <p>5 Requires speculation.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I -- I don't know. To answer, I would</p> <p>8 have to speculate.</p> <p>9 BY MS. WEST:</p> <p>10 <b>Q. Let me scroll down here. Do you see</b></p> <p>11 <b>the signature that's on the left-hand side of</b></p> <p>12 <b>the first page, which is City-JF 40 where it</b></p> <p>13 <b>says "ASA," and it looks like there is a</b></p> <p>14 <b>signature next to it.</b></p> <p>15 <b>Do you see that?</b></p> <p>16 A. I do see that.</p> <p>17 <b>Q. Okay. Is that your signature? I'm</b></p> <p>18 <b>sorry.</b></p> <p>19 A. I don't remember creating this</p> <p>20 document. I don't remember taking a -- the</p> <p>21 statement that's discussed in this document.</p> <p>22 That signature looks like it could be my</p> <p>23 signature, but I can't say that it is.</p> <p>24 <b>Q. And why can't you say that it is?</b></p>	Page 72	<p>1 <b>show you with my cursor here where it starts</b></p> <p>2 <b>with "Sheene states" right here.</b></p> <p>3 A. Yes.</p> <p>4 <b>Q. Do you see where I'm talking about?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. Okay. Can you -- I'm going to have you</b></p> <p>7 <b>read this, please. If you could read it out</b></p> <p>8 <b>loud starting right here with "Sheene states..."</b></p> <p>9 A. Sure.</p> <p>10 "Sheene states that the man who is</p> <p>11 pictured in Exhibit #1 is the same -- crossed</p> <p>12 off word -- man who grabbed her jacket that day.</p> <p>13 Sheene states that when the man grabbed her</p> <p>14 jacket, she saw that he had a handgun in his</p> <p>15 other hand. Sheene states that she got out of</p> <p>16 the truck and went to the Church's Chicken" -- I</p> <p>17 believe that's the word "on" -- "the south side</p> <p>18 of Madison at Central.</p> <p>19 Sheene stood outside and saw both of</p> <p>20 the guys, the bread truck where Edward" -- I'm</p> <p>21 sorry -- "both of the guys in the bread truck</p> <p>22 where Edward was. Sheene states she couldn't</p> <p>23 hear what was being said, but she could see the</p> <p>24 guy in Exhibit #1 talking to Edward and pointing</p>

21 (Pages 69 to 72)

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Page 73	<p>1 his gun at Edward. Sheene saw Edward standing</p> <p>2 inside" -- and the cursor is over it.</p> <p>3 <b>Q. Oh, I'm sorry.</b></p> <p>4 A. I think it's a -- I think "while" --</p> <p>5 "the guy in Exhibit #1 was patting Edward down.</p> <p>6 Sheene states that the other guy" -- oh, sorry.</p> <p>7 That was my cursor.</p> <p>8 "Sheene states that the other guy was</p> <p>9 holding a gun on Edward and pointing..."</p> <p>10 <b>Q. I'm going to have you keep going,</b></p> <p>11 <b>please.</b></p> <p>12 A. "... his gun at Edward while the guy in</p> <p>13 Exhibit #1 was patting Edward, crossed off</p> <p>14 something, down. Sheene states that she saw the</p> <p>15 guy in Exhibit #1 holding a bunch of money in</p> <p>16 bills, and then both guys turned to get off the</p> <p>17 bread truck. Sheene states at that the other</p> <p>18 guy opened the passenger door, and he and the</p> <p>19 guy in Exhibit #1 jumped off the bread truck."</p> <p>20 A word was crossed off.</p> <p>21 "After the guys got off the bread</p> <p>22 truck, they ran across Madison towards the</p> <p>23 northeast corner of -- crossed off -- Madison</p> <p>24 and Parkside on a diagonal. Sheene states she</p>	Page 75	<p>1 <b>Q. I'm going to stop you right there.</b></p> <p>2 <b>Thank you for reading that. And --</b></p> <p>3 MR. STARR: I'm just going to -- I'm just</p> <p>4 going to make an objection for the record that</p> <p>5 the document speaks for itself.</p> <p>6 BY MS. WEST:</p> <p>7 <b>Q. I'm going to scroll down. And I want</b></p> <p>8 <b>to ask you -- and this is page 45, Bates 45.</b></p> <p>9 <b>Typically, when you are taking a</b></p> <p>10 <b>statement of a witness, do you take a photograph</b></p> <p>11 <b>of that witness following or at some point</b></p> <p>12 <b>during the statement?</b></p> <p>13 A. Typically and generally speaking, yes,</p> <p>14 we did.</p> <p>15 <b>Q. Okay. And does this appear to be a</b></p> <p>16 <b>photograph or a Polaroid of the witness?</b></p> <p>17 MR. STARR: Form, foundation. Calls for</p> <p>18 speculation.</p> <p>19 MR. COYNE: Join.</p> <p>20 BY THE WITNESS:</p> <p>21 A. So I don't remember taking this</p> <p>22 statement. I don't remember writing the</p> <p>23 statement. It -- the exhibit is hard to see,</p> <p>24 because it -- it looks like it could be a</p>
Page 74	<p>1 saw Edward jump off the bread truck right after</p> <p>2 them. Sheene states she saw that Edward had a</p> <p>3 gun when he got off the truck. Sheene states</p> <p>4 she saw the two guys turn around and fire at</p> <p>5 Edward as they were running away.</p> <p>6 Sheene states she saw Edward fire back</p> <p>7 at the two guys. Sheene states that she saw at</p> <p>8 least 4 to 5 shots fired, but she's not exactly</p> <p>9 sure. Sheene states she saw the two guys</p> <p>10 running away turn and shoot at Edward more than</p> <p>11 once. Sheene states she saw the two guys run to</p> <p>12 Parkside and turn north and she saw Edward chase</p> <p>13 the two guys north on Parkside, but she did not</p> <p>14 follow them.</p> <p>15 Sheene states she then left the</p> <p>16 Church's Chicken parking lot and went to the</p> <p>17 laundry mat to start her clothes in the washer.</p> <p>18 After she started her laundry, she noticed a</p> <p>19 group of people gathering around outside the</p> <p>20 liquor store where she had earlier gone to buy</p> <p>21 laundry soap. Sheene went back across</p> <p>22 Central -- crossed off word -- and saw an older</p> <p>23 man laying in front of the liquor store bleeding</p> <p>24 from his mouth."</p>	Page 76	<p>1 photograph that has been photocopied, so it's</p> <p>2 hard for me to say what exactly this is.</p> <p>3 BY MS. WEST:</p> <p>4 <b>Q. I'm going to scroll on down to</b></p> <p>5 <b>Bates 46. This is what is identified as</b></p> <p>6 <b>Exhibit 1.</b></p> <p>7 <b>Do you see that?</b></p> <p>8 A. Yes.</p> <p>9 <b>Q. Okay. And it looks like a signature</b></p> <p>10 <b>with the name "Sheene Friend" is at the bottom</b></p> <p>11 <b>of the page.</b></p> <p>12 <b>Do you see that?</b></p> <p>13 A. I do see that.</p> <p>14 <b>Q. As well as what appears to be your</b></p> <p>15 <b>signature?</b></p> <p>16 A. It says -- it looks like it could be my</p> <p>17 signature, but because I don't remember taking</p> <p>18 this statement and I don't remember creating</p> <p>19 this document, I can't say that it is my</p> <p>20 signature.</p> <p>21 <b>Q. And in Ms. Friend's statement, the</b></p> <p>22 <b>portion that you just read, she identifies the</b></p> <p>23 <b>individual in Exhibit 1 as one of the offenders,</b></p> <p>24 <b>correct?</b></p>



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Page 77	<p>1 A. That's what's written in the document.</p> <p>2 <b>Q. Yes. And that's -- that was my</b></p> <p>3 <b>question.</b></p> <p>4 <b>Based on the document, Ms. Friend</b></p> <p>5 <b>identifies the individual in Exhibit 1 as one of</b></p> <p>6 <b>the offenders, correct?</b></p> <p>7 MR. STARR: Form, foundation, speculation.</p> <p>8 BY THE WITNESS:</p> <p>9 A. The document -- that's what the</p> <p>10 document says, but I don't have any independent</p> <p>11 recollection. So I can't say what she</p> <p>12 actually -- I can't say what she did.</p> <p>13 BY MS. WEST:</p> <p>14 <b>Q. Now, I understand you don't have an</b></p> <p>15 <b>independent recollection of taking the statement</b></p> <p>16 <b>of Ms. Friend.</b></p> <p>17 <b>But typically, all of the information</b></p> <p>18 <b>that's contained in the handwritten statement,</b></p> <p>19 <b>is that information that is related to you from</b></p> <p>20 <b>that particular witness?</b></p> <p>21 MR. COYNE: Objection, form.</p> <p>22 MR. STARR: Join.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Generally speaking, when I took</p>	Page 79	<p>1 <b>there was more than one offender in the</b></p> <p>2 <b>underlying robbery and murder of Mr. Sorrell?</b></p> <p>3 A. I don't have any independent</p> <p>4 recollection of -- of this, and I read the</p> <p>5 document, and I see what they say, but I don't</p> <p>6 have any independent recollection of this.</p> <p>7 <b>Q. And based on those documents, does it</b></p> <p>8 <b>identify that there was more than one offender</b></p> <p>9 <b>in the underlying crime that took place on</b></p> <p>10 <b>December 21st, 1990?</b></p> <p>11 A. There are documents that indicate that,</p> <p>12 but I don't have any independent recollection of</p> <p>13 it.</p> <p>14 <b>Q. So let me show you that one more time.</b></p> <p>15 <b>On this last page, which is page 5 of the</b></p> <p>16 <b>document or for the Bates range it's 44, the</b></p> <p>17 <b>middle paragraph here -- if you could just read</b></p> <p>18 <b>that middle paragraph, please. It starts with</b></p> <p>19 <b>"Sheene states that she..."</b></p> <p>20 MR. STARR: Same objection. The document</p> <p>21 speaks for itself.</p> <p>22 Go ahead.</p> <p>23 BY THE WITNESS:</p> <p>24 A. "Sheene states that she has been</p>
Page 78	<p>1 handwritten statements, it was writing down</p> <p>2 information I had received from a witness.</p> <p>3 BY MS. WEST:</p> <p>4 <b>Q. And the photograph that's in front of</b></p> <p>5 <b>you right now that's identified as Exhibit 1, do</b></p> <p>6 <b>you know that to be Mr. Fletcher?</b></p> <p>7 A. I have no independent recollection of</p> <p>8 who that person is.</p> <p>9 <b>Q. Are you aware that Mr. Fletcher was</b></p> <p>10 <b>charged with armed robbery and first degree</b></p> <p>11 <b>murder of an individual who was shot in December</b></p> <p>12 <b>of 1990?</b></p> <p>13 MR. COYNE: Jennifer, you can answer these</p> <p>14 questions as long as you don't divulge --</p> <p>15 yeah -- information that you received from me as</p> <p>16 a source in our confidential communications to</p> <p>17 prepare for this deposition.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I don't have any independent</p> <p>20 recollection of that.</p> <p>21 BY MS. WEST:</p> <p>22 <b>Q. And based on your review of the Felony</b></p> <p>23 <b>Review notes and the other documents that were</b></p> <p>24 <b>provided to you, is it your understanding that</b></p>	Page 80	<p>1 treated well by the police and Assistant State's</p> <p>2 Attorney Jennifer Walker and was not made any</p> <p>3 threats or promises for giving this statement.</p> <p>4 Sheene states that she has been given food to</p> <p>5 eat, coffee -- something crossed off -- to</p> <p>6 drink, and cigarettes to smoke. Sheene states</p> <p>7 she is not under the influence of drugs or</p> <p>8 alcohol at -- something crossed off -- the time</p> <p>9 of giving this statement. Sheene states..."</p> <p>10 BY MS. WEST:</p> <p>11 <b>Q. Sorry. You can stop here.</b></p> <p>12 A. Okay.</p> <p>13 <b>Q. Thank you.</b></p> <p>14 <b>Do you typically, when you're doing a</b></p> <p>15 <b>handwritten statement, ask the individual</b></p> <p>16 <b>witness if they've been treated well by the</b></p> <p>17 <b>police?</b></p> <p>18 A. Generally speaking, yes.</p> <p>19 <b>Q. And do you generally ask the witness if</b></p> <p>20 <b>they have been treated well by yourself?</b></p> <p>21 A. Yes. I generally did.</p> <p>22 <b>Q. Okay. And based on this document,</b></p> <p>23 <b>Ms. Friend indicated that she had been treated</b></p> <p>24 <b>well by both you and the police, correct?</b></p>

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<p style="text-align: right;">Page 81</p> <p>1 MR. STARR: Form, foundation, speculation. 2 BY THE WITNESS: 3 A. That's what the document says. 4 BY MS. WEST: 5 <b>Q. If you had witnessed any level of</b> 6 <b>misconduct by Detectives Bogucki and Schalk</b> 7 <b>during your review of Mr. Fletcher's case, would</b> 8 <b>you have reported it?</b> 9 MR. COYNE: Objection; form, foundation. 10 BY THE WITNESS: 11 A. It calls for -- in order to -- without 12 giving a better context to this, it's -- and 13 since I don't have an independent recollection 14 of these conversations and the review process of 15 this case, I -- I don't know how to answer that. 16 But I can say that I am mindful of my 17 obligations as a prosecutor -- my ethical 18 obligations as a prosecutor, and I would have -- 19 I would have acted in accordance with those 20 rules. 21 BY MS. WEST: 22 <b>Q. Have you ever reported a detective for</b> 23 <b>any type of misconduct during the course of your</b> 24 <b>time as a Felony Review assistant state's</b></p>	<p style="text-align: right;">Page 83</p> <p>1 <b>Q. And the Bates at the bottom is 3020.</b> 2 A. Okay. 3 <b>Q. Over on the left-hand side under</b> 4 <b>"incident," there appears to be some notes. I</b> 5 <b>think they are very difficult to read.</b> 6 <b>Can you read what's written there?</b> 7 MR. COYNE: Objection, foundation. 8 BY THE WITNESS: 9 A. The copy is so bad, I can't. It's too 10 light. I'm sorry. I can't. 11 BY MS. WEST: 12 <b>Q. No. Thank you. All right. Let's move</b> 13 <b>on down here. On Bates 3022, which is page 9 of</b> 14 <b>the document, under "statement" on the left-hand</b> 15 <b>side of that page -- and I'm sorry. For your</b> 16 <b>reference, it's March 9, '02.</b> 17 A. Yes. 18 <b>Q. And it's documented page 1 of 2.</b> 19 <b>Where it has "statement," under there</b> 20 <b>it says, "Type: Oral. Date: 21 Feb '02," can</b> 21 <b>you read what that time is?</b> 22 A. It appears that it says, "14:20." 23 <b>Q. And can you go ahead and read what it</b> 24 <b>says next to "statement witness"?</b></p>
<p style="text-align: right;">Page 82</p> <p>1 <b>attorney?</b> 2 A. I don't remember doing that. 3 <b>Q. Is that something that you would</b> 4 <b>remember doing based on the serious level of the</b> 5 <b>alleged misconduct?</b> 6 MR. COYNE: Objection; form, foundation, 7 speculation. 8 BY THE WITNESS: 9 A. I believe I would, but I can't 10 remember. So I can't say for sure. 11 BY MS. WEST: 12 <b>Q. Let me show you -- we will go back to</b> 13 <b>Exhibit 1. I want to ask you if you can read a</b> 14 <b>portion of the writing.</b> 15 <b>(Walker Exhibit No. 1 published</b> 16 <b>to Zoom participants.)</b> 17 BY MS. WEST: 18 <b>Q. All right. This is going to be</b> 19 <b>Bates 3020, page 7 of the document. Over here</b> 20 <b>on the left-hand side under "incident," it's --</b> 21 <b>A. I'm sorry. What date -- I'm sorry.</b> 22 <b>What date is this?</b> 23 <b>Q. Sure. So this is March 9, '02.</b> 24 A. Okay.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. It says, "ASA J Walker, DET Schalk 2 #20718." I believe, "DET Bogucki #20668. Delta 3 AOR. Delta waived. In summary, delta stated he 4 wasn't there and didn't know anything" -- I'm 5 not sure what that word is -- and then "it." 6 <b>Q. Okay. Now, you previously testified</b> 7 <b>that you do have a recollection of going to</b> 8 <b>speak with Mr. Fletcher at an IDOC facility,</b> 9 <b>correct?</b> 10 A. I remember going to an IDOC facility 11 with Detective Schalk and Detective Bogucki, 12 yes. 13 <b>Q. Okay. Do you specifically recall the</b> 14 <b>purpose was to speak with Mr. Fletcher?</b> 15 A. I don't have an independent 16 recollection, but going to speak with someone 17 would be the purpose of going to IDOC. 18 <b>Q. Okay. And based on this, does it</b> 19 <b>appear that on February 21st, '02, you,</b> 20 <b>Detective Schalk, and Detective Bogucki met with</b> 21 <b>Mr. Fletcher, or the defendant, as noted in this</b> 22 <b>case?</b> 23 A. That's what this document says. I 24 don't have an independent recollection of</p>

24 (Pages 81 to 84)

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Page 85	<p>1 creating it, and I don't have an independent</p> <p>2 recollection of the conversation that could have</p> <p>3 occurred at IDOC.</p> <p>4 <b>Q. Okay. Just so I'm clear, I understand</b></p> <p>5 <b>you don't have an independent recollection of</b></p> <p>6 <b>the conversation.</b></p> <p>7 <b>Do you have an independent recollection</b></p> <p>8 <b>of meeting with Mr. Fletcher?</b></p> <p>9 A. I don't -- I -- I remember going to</p> <p>10 IDOC with Detective Schalk and Detective</p> <p>11 Bogucki. We were riding in the same car. I</p> <p>12 don't remember -- and I remember that the ride</p> <p>13 lasted a while. I don't remember meeting with</p> <p>14 anyone when we got there.</p> <p>15 <b>Q. Okay. Where it's documented "AOR,"</b></p> <p>16 <b>what does AOR mean?</b></p> <p>17 A. Generally speaking, AOR would mean</p> <p>18 advised of rights.</p> <p>19 <b>Q. Okay, and next to "defendant AOR," it</b></p> <p>20 <b>says, "defendant waived."</b></p> <p>21 <b>Do you see that?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. Okay. Does that indicate that</b></p> <p>24 <b>individual waived his right and he spoke to you</b></p>	Page 87	<p>1 obligations as an -- ethical obligations as a</p> <p>2 prosecutor, and I would have acted in accordance</p> <p>3 with those -- those rules.</p> <p>4 BY MS. WEST:</p> <p>5 <b>Q. All right. Moving on. The next date</b></p> <p>6 <b>is going to be March 16, 2002. And it's going</b></p> <p>7 <b>to be Bates 3028. Let me know whenever you have</b></p> <p>8 <b>had the opportunity to find it.</b></p> <p>9 A. I have it. Thank you.</p> <p>10 <b>Q. Okay. Great. All right. Under --</b></p> <p>11 <b>sorry. Give me a second to orient myself.</b></p> <p>12 <b>All right. Under "action" -- which is</b></p> <p>13 <b>on the left-hand side of the page, it's like</b></p> <p>14 <b>that second box in the middle column.</b></p> <p>15 <b>Do you see what I'm talking about?</b></p> <p>16 A. Action?</p> <p>17 <b>Q. And it's right where my cursor is right</b></p> <p>18 <b>in here.</b></p> <p>19 A. Oh, yeah, yeah, yeah. I see that.</p> <p>20 Sorry.</p> <p>21 <b>Q. Okay. Can you read what it says?</b></p> <p>22 A. Underneath the word "action" it says,</p> <p>23 "arrest warrant approved."</p> <p>24 <b>Q. Okay. What does that mean?</b></p>
Page 86	<p>1 <b>and the detectives?</b></p> <p>2 A. Generally, that's --</p> <p>3 MR. STARR: Speculation --</p> <p>4 BY THE WITNESS:</p> <p>5 A. -- what that would indicate.</p> <p>6 MR. STARR: Sorry. Belated objection. Form,</p> <p>7 foundation, speculation.</p> <p>8 BY MS. WEST:</p> <p>9 <b>Q. I'm sorry, Ms. Walker. Can you repeat</b></p> <p>10 <b>your answer, please?</b></p> <p>11 A. Generally speaking, that's what that</p> <p>12 would mean. I don't have an independent</p> <p>13 recollection of this event, so I can't say that</p> <p>14 that's what happened.</p> <p>15 <b>Q. Had you witnessed Detective Schalk or</b></p> <p>16 <b>Bogucki making threats towards Mr. Fletcher</b></p> <p>17 <b>during this interview, would you have reported</b></p> <p>18 <b>it?</b></p> <p>19 MR. COYNE: Objection; foundation,</p> <p>20 speculation.</p> <p>21 MR. STARR: Join.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I cannot answer without speculating,</p> <p>24 but would be mindful -- I was mindful of my</p>	Page 88	<p>1 A. Generally, it would mean that an arrest</p> <p>2 warrant for the defendant was approved.</p> <p>3 MS. WEST: All right. I'm going to show you</p> <p>4 what we will mark as Exhibit 3. And this is the</p> <p>5 arrest warrant. For the record, it is Bates</p> <p>6 Individual Defendants 001604.</p> <p>7 (Whereupon, Walker Deposition</p> <p>8 Exhibit No. 3 was marked for</p> <p>9 identification.)</p> <p>10 BY MS. WEST:</p> <p>11 <b>Q. Ms. Walker, do you have this document</b></p> <p>12 <b>in front of you?</b></p> <p>13 A. I do.</p> <p>14 <b>Q. Okay. Great. Are you familiar, just</b></p> <p>15 <b>generally, with this document -- this type of</b></p> <p>16 <b>document, I should say?</b></p> <p>17 A. I am familiar generally speaking with</p> <p>18 the arrest warrant form.</p> <p>19 <b>Q. Okay. And over on the left-hand side</b></p> <p>20 <b>written on the side of the page, do you see your</b></p> <p>21 <b>name, ASA Jennifer Walker?</b></p> <p>22 A. I do see my name, yes.</p> <p>23 <b>Q. Okay. It looks like there is a couple</b></p> <p>24 <b>other letters following your name.</b></p>

25 (Pages 85 to 88)

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Page 89	<p>1           <b>Do you see that?</b></p> <p>2           A. I do.</p> <p>3           <b>Q. Do you know what that is?</b></p> <p>4           A. I don't. I can say that AS -- the ASA</p> <p>5 Jennifer Walker's handwriting does not look like</p> <p>6 my handwriting. I do not believe that I signed</p> <p>7 it. I -- it could be that those additional</p> <p>8 letters mean that that was somebody else signing</p> <p>9 my name based on -- on I have seen signatures</p> <p>10 like that -- or I have seen writing like that</p> <p>11 before where it's somebody else writing</p> <p>12 somebody's name on -- on their behalf.</p> <p>13           I don't -- I don't remember preparing</p> <p>14 this document. I don't know that I have ever</p> <p>15 seen this document before preparing for the</p> <p>16 deposition. I do -- that -- it is not my</p> <p>17 signature on the left-hand side.</p> <p>18           <b>Q. Okay. Thank you.</b></p> <p>19           <b>Do you have any idea whose initials</b></p> <p>20 <b>that might be next to your name?</b></p> <p>21           MR. COYNE: Objection, foundation.</p> <p>22 BY THE WITNESS:</p> <p>23           A. I do not know.</p> <p>24 BY MS. WEST:</p>	Page 91
Page 90	<p>1           <b>Q. Okay. And the arrest warrant is for</b></p> <p>2 <b>the arrest of Mr. James Fletcher, correct?</b></p> <p>3           A. That's what this piece of paper says,</p> <p>4 yes.</p> <p>5           <b>Q. Okay. And on the arrest warrant it</b></p> <p>6 <b>documents "for the offense of first-degree</b></p> <p>7 <b>murder."</b></p> <p>8           <b>Do you see that?</b></p> <p>9           A. Yes. I do see those words on this</p> <p>10 document.</p> <p>11           <b>Q. Okay. And it looks like at the bottom</b></p> <p>12 <b>the arresting officers are listed as Detective</b></p> <p>13 <b>Schalk and Bogucki.</b></p> <p>14           <b>Do you see that?</b></p> <p>15           A. I do see that on the document.</p> <p>16           <b>Q. Okay. I think I know the answer to</b></p> <p>17 <b>this question considering that you don't have an</b></p> <p>18 <b>independent recollection of being involved in</b></p> <p>19 <b>this, but I just want to close out on this.</b></p> <p>20           <b>What, if any, role did you play in</b></p> <p>21 <b>regards to the arrest warrant being sought for</b></p> <p>22 <b>the arrest of James Fletcher?</b></p> <p>23           MR. STARR: Asked and answered.</p> <p>24 BY THE WITNESS:</p>	Page 92

26 (Pages 89 to 92)

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<p>1           <b>And based on the Felony Review folder</b></p> <p>2           <b>notes that you have in front of you, W1 or</b></p> <p>3           <b>Witness 1 is Terry Rogers, correct?</b></p> <p>4           A. So I don't have an independent</p> <p>5           recollection of creating this document even</p> <p>6           though the handwriting looks like it could be</p> <p>7           mine. In this document it indicates that Terry</p> <p>8           Rogers is listed -- the name Terry Rogers is</p> <p>9           listed in what would be considered the W1 box.</p> <p>10          <b>Q. Okay. And same question for Witness 2,</b></p> <p>11          <b>which is also on the right-hand side of this</b></p> <p>12          <b>page.</b></p> <p>13          <b>Witness 2 listed on this document is</b></p> <p>14          <b>Sheene Friend, correct?</b></p> <p>15          A. On this document, it's -- the name</p> <p>16          Sheene Friend is listed in what would be</p> <p>17          considered the Witness 2 box.</p> <p>18          <b>Q. Okay. So then based on what you just</b></p> <p>19          <b>read under the incident, Witness 1, being Terry</b></p> <p>20          <b>Rogers, ID'd the defendant in the photo lineup,</b></p> <p>21          <b>correct?</b></p> <p>22          MR. STARR: Form, foundation, speculation.</p> <p>23          BY THE WITNESS:</p> <p>24          A. The notes on this document indicate</p>	<p>1           because I don't have an independent</p> <p>2           recollection.</p> <p>3           <b>Q. And then on down with Ms. Friend, the</b></p> <p>4           <b>notes also support that a positive</b></p> <p>5           <b>identification of the defendant in a photo array</b></p> <p>6           <b>occurred with Ms. Friend as well, right?</b></p> <p>7           MR. STARR: Form, foundation, speculation.</p> <p>8           BY THE WITNESS:</p> <p>9           A. The notes indicate positive</p> <p>10          identification. That's what the document says,</p> <p>11          but I don't have any independent recollection of</p> <p>12          this. So -- so I can't say what did or didn't</p> <p>13          happen.</p> <p>14          BY MS. WEST:</p> <p>15          <b>Q. You also see that there's like a little</b></p> <p>16          <b>star down under the notes of Ms. Friend. Let me</b></p> <p>17          <b>scroll over here.</b></p> <p>18          <b>Can you see that?</b></p> <p>19          A. I can see it better since you've pulled</p> <p>20          it up.</p> <p>21          <b>Q. Okay. Can you read what that says?</b></p> <p>22          A. It says, "W" -- that might be a 2 --</p> <p>23          "was 'dating,' in quotes, V2 at time of" -- I</p> <p>24          believe the next word is incident -- "but they</p>
Page 94	Page 96
<p>1           there was a positive -- that Terry Rogers made a</p> <p>2           positive identification. I don't have an</p> <p>3           independent recollection, and I can't say what</p> <p>4           actually happened, because I don't have an</p> <p>5           independent recollection.</p> <p>6           BY MS. WEST:</p> <p>7           <b>Q. Sure. And over on the right-hand side</b></p> <p>8           <b>where Terry Rogers is listed as a witness, the</b></p> <p>9           <b>notes there also support that there was a</b></p> <p>10          <b>positive identification by Mr. Rogers of the</b></p> <p>11          <b>defendant in a photo array on February 13th,</b></p> <p>12          <b>2002, correct?</b></p> <p>13          MR. STARR: Form, foundation, speculation.</p> <p>14          BY THE WITNESS:</p> <p>15          A. The document says there was a positive</p> <p>16          identification. I don't know if that is -- I</p> <p>17          don't have an independent recollection to be</p> <p>18          able to say what -- what occurred in -- in the</p> <p>19          real world.</p> <p>20          BY MS. WEST:</p> <p>21          <b>Q. And the identification was based off of</b></p> <p>22          <b>a photo array, correct, based on these notes?</b></p> <p>23          A. The notes say photo array, but I</p> <p>24          can't -- I can't say what actually happened,</p>	<p>1           stopped seeing each other shortly after."</p> <p>2           <b>Q. Do you have a recollection of receiving</b></p> <p>3           <b>that information from Ms. Friend?</b></p> <p>4           A. I do not.</p> <p>5           <b>Q. All right. Let's take a look at 3024,</b></p> <p>6           <b>which is March 16, '02. And I would like to</b></p> <p>7           <b>direct your attention onto the right-hand side</b></p> <p>8           <b>of the page.</b></p> <p>9           <b>Witness 3 is identified on this</b></p> <p>10          <b>document as Emmett Wade; is that right?</b></p> <p>11          A. This document states -- has the name</p> <p>12          Emmett Wade in the box for Witness 3, yes.</p> <p>13          <b>Q. Under "Notes" it looks like it says,</b></p> <p>14          <b>"I" -- with a circle around it -- "by ASA Walker</b></p> <p>15          <b>16 Mar 02."</b></p> <p>16          <b>Do you see that?</b></p> <p>17          A. I do see those words.</p> <p>18          <b>Q. Okay. And I know we've talked about</b></p> <p>19          <b>this. The "I" with the circle around it means</b></p> <p>20          <b>an interview, correct?</b></p> <p>21          A. Generally, "I" with a circle means</p> <p>22          interview.</p> <p>23          <b>Q. And based on these notes, can you say</b></p> <p>24          <b>that you interviewed Mr. Wade on March 16, 2002?</b></p>



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<p style="text-align: right;">Page 97</p> <p>1 A. I have no independent recollection of 2 meeting with an Emmett Wade. I have no 3 independent recollection of creating this 4 document. Although, the handwriting does look 5 like my handwriting. 6 <b>Q. And the note would indicate to you that 7 an interview was done on March 16, '02, correct?</b> 8 A. The document appears to say that. 9 <b>Q. Okay. And that the interview was 10 conducted by ASA Walker?</b> 11 MR. STARR: Form, foundation, speculation. 12 BY THE WITNESS: 13 A. The document appears to say that; 14 though, I have no independent recollection. 15 BY MS. WEST: 16 <b>Q. I'm going to take you back to 3028. 17 This is pretty small. So let me try to make it 18 big so that way you can see it. On the 19 left-hand side of the page where it says, 20 "additional investigation required." 21 Do you see where I'm at?</b> 22 A. Yes. I see that. I see those words 23 printed, yes. 24 <b>Q. Okay. It looks like it says, "No. 1,</b></p>	<p style="text-align: right;">Page 99</p> <p>1 <b>What do you -- can you read for No. 2, 2 please?</b> 3 A. I believe No. 2 is a word that begins 4 with C. I believe that word is "conduct," but 5 I'm not 100 percent, because there is some light 6 spots in the writing. The second word appears 7 to be "lineups." Then "with all witnesses" and 8 the number -- 9 <b>Q. I'm sorry. Go ahead.</b> 10 A. Do you want me to keep reading? 11 <b>Q. Let me ask you a quick question about 12 that, and then we'll move on.</b> 13 <b>Based on what's documented as No. 2, 14 does that indicate to you that lineups had not 15 been done with all the witnesses in this case as 16 of March 16, 2002?</b> 17 MR. STARR: Form, foundation, speculation. 18 MR. COYNE: Join. 19 BY THE WITNESS: 20 A. I don't remember creating this 21 document. I don't remember what the -- the 22 details of this. Generally speaking, it 23 could -- in my work as a -- on Felony Review, it 24 could indicate that line -- additional lineups</p>
<p style="text-align: right;">Page 98</p> <p>1 <b>order FT photos."</b> 2 <b>Do you see that?</b> 3 A. The copy isn't great. I am unsure if 4 that is an F or not. It looks like there may be 5 a bottom. It may be an -- I see kind of a 6 little line there. So I'm not sure -- I'm not 7 sure what that -- if that's an F or it could be 8 another letter, but I do see "order," a letter 9 "T," and then I see the word "photos." 10 <b>Q. Okay. And if it were to say, "order ET 11 photos," based on your experience as a Felony 12 Review assistant state's attorney, what is ET 13 photos referring to?</b> 14 A. As I -- based on my general experience, 15 ET refers to -- as evidence technician. There 16 may be -- this could indicate that there were 17 photographs taken in this investigation by an 18 evidence technician, but I, again, don't have an 19 independent recollection of creating this 20 document or an independent recollection of the 21 review of this. 22 <b>Q. Okay. Next to it on No. 2 -- how about 23 this? I will have you read it, because -- let's 24 do it that way.</b></p>	<p style="text-align: right;">Page 100</p> <p>1 needed to happen. 2 BY MS. WEST: 3 <b>Q. And can you read No. 3, please?</b> 4 A. Did somebody say something? Okay. 5 No. 3. Reading No. 3: "ASA to interview" -- I 6 believe that it would be Edward Cooper. 7 <b>Q. Okay.</b> 8 A. No. 4, "W" -- I'm not sure what that 9 is -- "will need to go to JG -- GJ." I'm sorry. 10 <b>Q. And does GJ stand for grand jury?</b> 11 A. Typically, GJ would stand for grand 12 jury. 13 <b>Q. Based on the notes that we've gone 14 through so far, at this point in time had you 15 spoken with Mr. Cooper?</b> 16 MR. COYNE: Objection, foundation. 17 MR. STARR: Join. 18 BY THE WITNESS: 19 A. I don't have an independent 20 recollection. I don't know. 21 BY MS. WEST: 22 <b>Q. And then let's go over here to this 23 side of the page. With regard to Mr. Cooper, 24 under "Notes" it looks like it says, I with a</b></p>

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Page 101	<p>1 circle around it -- so "interview by phone ASA</p> <p>2 Walker March 9, 2002."</p> <p>3 Do you see that?</p> <p>4 A. I do see that.</p> <p>5 Q. Okay. Based on that note, does it</p> <p>6 appear that Mr. Cooper was spoken to or</p> <p>7 interviewed over the phone on March 9, 2002?</p> <p>8 A. There are words that -- that say that.</p> <p>9 But I don't have an independent recollection of</p> <p>10 creating this document or of having a -- any</p> <p>11 such conversation, so I can't answer that</p> <p>12 without speculating.</p> <p>13 Q. Do you have any reason to doubt the</p> <p>14 accuracy that's what's -- as to what's</p> <p>15 documented on the Felony Review folder sheet</p> <p>16 that's maintained by the Office of the State's</p> <p>17 Attorney's Office -- I'm sorry -- by the State's</p> <p>18 Attorney's Office?</p> <p>19 MR. COYNE: Objection, foundation,</p> <p>20 speculation.</p> <p>21 MR. STARR: Join. Form as well.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I don't -- because I don't have an</p> <p>24 independent recollection, I can't say whether or</p>	Page 103	<p>1 A. So I don't have any independent</p> <p>2 recollection of the events described in this</p> <p>3 document. I don't have an independent</p> <p>4 recollection as to creating this document.</p> <p>5 Although, the handwriting in this document does</p> <p>6 look like it could be mine. The words on this</p> <p>7 page indicate that on April 18th of '02 the --</p> <p>8 there was an arrest made at 26 -- at 26th Street</p> <p>9 by Detectives Schalk and Bogucki, and the arrest</p> <p>10 would be for the defendant, James Fletcher.</p> <p>11 Q. Okay. And it was based off of the</p> <p>12 arrest warrant?</p> <p>13 MR. COYNE: Objection, foundation.</p> <p>14 BY THE WITNESS:</p> <p>15 A. This document does not indicate -- oh,</p> <p>16 never mind. This document says he was arrested</p> <p>17 off of the arrest warrant. I don't have any</p> <p>18 independent recollection of that or of creating</p> <p>19 this document.</p> <p>20 BY MS. WEST:</p> <p>21 Q. Over on the right-hand side of this</p> <p>22 page for -- I'm sorry, for Victim 2, Edward</p> <p>23 Cooper, is it documented that an interview was</p> <p>24 conducted of Mr. Cooper on April 20, 2002?</p>
Page 102	<p>1 not something happened. I don't have a doubt.</p> <p>2 I just -- I can't say yes or no either way.</p> <p>3 BY MS. WEST:</p> <p>4 Q. Okay. Thank you. That helps clear it</p> <p>5 up.</p> <p>6 So you don't necessarily doubt the</p> <p>7 accuracy of what's written here? You just don't</p> <p>8 have an independent recollection of actually</p> <p>9 taking these steps that are documented; is that</p> <p>10 fair?</p> <p>11 MR. STARR: Asked and answered.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Correct.</p> <p>14 BY MS. WEST:</p> <p>15 Q. Thank you. All right. I'm going to</p> <p>16 take you down to 333.</p> <p>17 Sorry. Did somebody say something?</p> <p>18 All right. At the top of 3033, the</p> <p>19 date is April 20, 2002. Do you see that?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And on the left-hand side under</p> <p>22 "arrest," based on what's documented here, does</p> <p>23 it appear that the defendant, or Mr. Fletcher,</p> <p>24 was arrested on April 18, 2002?</p>	Page 104	<p>1 MR. STARR: Form, foundation, speculation.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I don't have an independent</p> <p>4 recollection of creating this document or of any</p> <p>5 interview with Mr. Cooper. The words on this --</p> <p>6 on this document indicate that there was an</p> <p>7 interview by ASA Walker on 20 April '02.</p> <p>8 BY MS. WEST:</p> <p>9 Q. And also based on what's noted here,</p> <p>10 there was a positive identification at a lineup</p> <p>11 by Mr. Cooper.</p> <p>12 Do you see that?</p> <p>13 A. I see the words -- I see the plus sign,</p> <p>14 ID at lineup 20 April '02 on the document.</p> <p>15 Again, I don't have any personal -- I don't have</p> <p>16 any independent recollection of that or of</p> <p>17 creating this.</p> <p>18 Q. And just so we're clear, you do have an</p> <p>19 independent recollection of being involved in an</p> <p>20 in-person lineup relative to Mr. Fletcher's</p> <p>21 case?</p> <p>22 A. I do not.</p> <p>23 Q. Typically speaking, as a Felony Review</p> <p>24 assistant state's attorney, would you be</p>

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Page 105	<p>1 involved in the lineup or the viewing of a</p> <p>2 lineup with witnesses?</p> <p>3 MR. COYNE: Objection; form, foundation.</p> <p>4 BY THE WITNESS:</p> <p>5 A. Typically, ASAs on Felony Review are</p> <p>6 not involved in lineups. But I can't -- I don't</p> <p>7 have an independent recollection of anything, so</p> <p>8 I don't know.</p> <p>9 BY MS. WEST:</p> <p>10 Q. All right. At the bottom of that under</p> <p>11 "Notes," we have already gone over the</p> <p>12 "interviewed by ASA Walker" portion, but that</p> <p>13 second line, can you read that?</p> <p>14 A. Starting with V2?</p> <p>15 Q. Yes, please.</p> <p>16 A. "V2 was dating Witness 2 at time of</p> <p>17 incident, but stopped seeing each other shortly</p> <p>18 after."</p> <p>19 Q. Okay. And we previously read a similar</p> <p>20 entry for Ms. Friend that indicated that she was</p> <p>21 dating V2, which is Mr. Cooper.</p> <p>22 Do you recall reading that?</p> <p>23 A. I recall reading previously that V2 --</p> <p>24 yes. I previously recall reading that.</p>	Page 107	<p>1 Q. And do you see over on the -- that same</p> <p>2 page it says, "3 of 3"?</p> <p>3 A. Yes.</p> <p>4 Q. When you reviewed these documents that</p> <p>5 are the Felony Review folder, did you see a</p> <p>6 page 2 of 3 for April 20, 2002?</p> <p>7 A. I did not.</p> <p>8 Q. Okay. Can you just generally explain</p> <p>9 to me how -- how this is documented so that I</p> <p>10 can better understand the chronology of</p> <p>11 everything?</p> <p>12 MR. COYNE: Objection; form, foundation.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I'm not sure I understand your</p> <p>15 question.</p> <p>16 BY MS. WEST:</p> <p>17 Q. Sure. So when you start a date entry,</p> <p>18 do you document page 1 of 3 or 2 of 3?</p> <p>19 Is that generally how you document it</p> <p>20 when you're filling these out?</p> <p>21 A. Yes. So. So you -- you have a folder,</p> <p>22 and if you need additional folders, you add them</p> <p>23 as subsequent -- generally speaking, you would</p> <p>24 add them as subsequent pages. So typically --</p>
Page 106	<p>1 Q. Ms. Walker, let me ask you this: Do</p> <p>2 you need a break, or would you like to keep</p> <p>3 going?</p> <p>4 A. I'm okay if we keep going, because then</p> <p>5 I won't feel so bad if we have to stop to -- for</p> <p>6 me to do my thing.</p> <p>7 MS. WEST: Okay. Is everybody else okay to</p> <p>8 keep going?</p> <p>9 MR. COYNE: Yeah, sure. Allyson, do you have</p> <p>10 an estimate as to how long just so I can tell</p> <p>11 the office here?</p> <p>12 MS. WEST: Yeah, sure. So I know I promised</p> <p>13 1:30. It's probably going to be more like 2:00,</p> <p>14 about another hour. Is -- with that in mind, is</p> <p>15 everybody okay to keep going until Ms. Walker</p> <p>16 needs to take her break?</p> <p>17 MR. COYNE: Sure.</p> <p>18 MS. WEST: Okay. Thank you.</p> <p>19 BY MS. WEST:</p> <p>20 Q. All right. Let's take a look at 3030</p> <p>21 of the fell Felony Review folder.</p> <p>22 Do you see the date at the top,</p> <p>23 April 20th, 2002?</p> <p>24 A. I do.</p>	Page 108	<p>1 and to know -- to get a sense of how many pages</p> <p>2 you should have in that set, we would write, you</p> <p>3 know, 1 of the total number so that it was</p> <p>4 easier to keep track of.</p> <p>5 Q. Okay. And based on that and this being</p> <p>6 3 of 3, does that give you an indication that</p> <p>7 there would have been page 2 of 3 relative to</p> <p>8 April 20th, '02?</p> <p>9 MR. COYNE: Objection, foundation.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Because I don't remember creating this</p> <p>12 document, even though the handwriting is mine, I</p> <p>13 cannot say for sure. It is certainly possible.</p> <p>14 But I -- I can't remember for sure if there was</p> <p>15 a page 2 in this set.</p> <p>16 BY MS. WEST:</p> <p>17 Q. Thank you.</p> <p>18 At the top where it says "start time"</p> <p>19 and "finish time," above "finish time" it looks</p> <p>20 like it has a different date than April 20th.</p> <p>21 Do you see that?</p> <p>22 A. I see -- so my -- my copy is kind of</p> <p>23 bad, and yours kind of has the same thing. It</p> <p>24 looks like somebody -- like it had a -- maybe a</p>



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Page 109	<p>1 hole punch in -- on it or something. I'm not</p> <p>2 sure. But it looks as though there was a</p> <p>3 different date written in front of it, but</p> <p>4 because of that circle that was copied, I can't</p> <p>5 tell exactly what that date would be.</p> <p>6 <b>Q. Okay. Is it unusual for a particular</b></p> <p>7 <b>entry on this folder to span multiple days?</b></p> <p>8 MR. COYNE: Objection; form, foundation.</p> <p>9 BY THE WITNESS:</p> <p>10 A. It is -- I don't have any independent</p> <p>11 recollection of creating this document or of the</p> <p>12 events surrounding what's inside of it. But</p> <p>13 generally speaking, it could be if -- if a case</p> <p>14 gets called in and you know it's going to be</p> <p>15 called in a few days later, it could be that you</p> <p>16 would hold the file and add to it as opposed to</p> <p>17 creating a whole new separate set of -- for lack</p> <p>18 of a better word -- stuff.</p> <p>19 If you were continuing to work on it</p> <p>20 and you knew you were going to be continuing to</p> <p>21 work on it, that could -- that is something that</p> <p>22 could happen. But I don't know, because I -- I</p> <p>23 don't have an independent recollection.</p> <p>24 BY MS. WEST:</p>	Page 111	<p>1 document, but -- so I can't say if that actually</p> <p>2 happened or not.</p> <p>3 BY MS. WEST:</p> <p>4 <b>Q. But that's what's documented here,</b></p> <p>5 <b>correct?</b></p> <p>6 A. But there are words to that effect on</p> <p>7 that document, yes. There's words to</p> <p>8 that effect.</p> <p>9 <b>Q. And also -- I'm sorry.</b></p> <p>10 A. Sorry.</p> <p>11 <b>Q. Also there is words "no ID," and it's</b></p> <p>12 <b>circled.</b></p> <p>13 <b>Do you see that?</b></p> <p>14 A. I -- I see a circle around the word "no</p> <p>15 ID."</p> <p>16 <b>Q. Okay. And generally speaking, does</b></p> <p>17 <b>that mean that a witness is unable to make an</b></p> <p>18 <b>identification?</b></p> <p>19 A. Generally speaking, during my time on</p> <p>20 review, yes, that -- that would be the case.</p> <p>21 <b>Q. Okay. And based on the document -- I'm</b></p> <p>22 <b>sorry -- the notes and the documentation here,</b></p> <p>23 <b>it appears that Mr. Wade could not make an</b></p> <p>24 <b>identification of an offender, correct?</b></p>
Page 110	<p>1 <b>Q. Okay. Thank you.</b></p> <p>2 <b>And on the right-hand side of this</b></p> <p>3 <b>page, Emmett Wade is listed as a witness.</b></p> <p>4 <b>Do you see that?</b></p> <p>5 A. I see the words "Emmett Wade," yes.</p> <p>6 <b>Q. Okay. And down under "Notes," it</b></p> <p>7 <b>appears that it says "interviewed by ASA Walker</b></p> <p>8 <b>16 March 02."</b></p> <p>9 <b>Do you see that?</b></p> <p>10 A. I see those words, yes.</p> <p>11 <b>Q. Okay. And there looks like there's an</b></p> <p>12 <b>arrow -- and then tell me if I'm reading this</b></p> <p>13 <b>correctly -- "didn't get a good look at the</b></p> <p>14 <b>robbers"?</b></p> <p>15 A. I see -- yes. I see those words too.</p> <p>16 <b>Q. Okay. And based on that note, does it</b></p> <p>17 <b>appear that Mr. Wade was interviewed on</b></p> <p>18 <b>March 16th, 2002?</b></p> <p>19 MR. COYNE: Objection, foundation.</p> <p>20 MR. STARR: Join.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I don't have a specific recollection of</p> <p>23 this. I don't have a specific recollection</p> <p>24 either of any interview or of creating this</p>	Page 112	<p>1 MR. COYNE: Objection, foundation.</p> <p>2 BY THE WITNESS:</p> <p>3 A. Well, I can't say that, because I don't</p> <p>4 have an independent recollection. I can say</p> <p>5 that the word "no ID" was circled -- or the</p> <p>6 phrase "no ID" was circled.</p> <p>7 BY MS. WEST:</p> <p>8 <b>Q. Typically, when you would speak with a</b></p> <p>9 <b>witness, would the detectives be present?</b></p> <p>10 A. Typically, the detectives would be</p> <p>11 present when I spoke with a witness for most of</p> <p>12 the time.</p> <p>13 <b>Q. Are there instances that you can think</b></p> <p>14 <b>of where you would speak with the witness</b></p> <p>15 <b>without a detective?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. What are those instances?</b></p> <p>18 MR. COYNE: Objection; form, foundation. And</p> <p>19 also, Jennifer, you can answer that question</p> <p>20 provided you would not be divulging your</p> <p>21 opinions about the evidence, your strategies,</p> <p>22 your legal theories, your mental decision-making</p> <p>23 in your work as a prosecutor.</p> <p>24 So provided you can answer that</p>

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Page 113	<p>1 question without divulging those mental</p> <p>2 impressions, you can go ahead.</p> <p>3 MR. HOLMES: Same admonition on behalf of the</p> <p>4 Office.</p> <p>5 BY MS. WEST:</p> <p>6 <b>Q. Can you answer the question?</b></p> <p>7 A. I'm not sure if there is a -- if I have</p> <p>8 a -- may I speak to John first?</p> <p>9 MR. COYNE: Sure.</p> <p>10 MS. WEST: You know what? Let me withdraw</p> <p>11 the question. I will withdraw, and we can move</p> <p>12 forward.</p> <p>13 BY MS. WEST:</p> <p>14 <b>Q. Do you have an independent recollection</b></p> <p>15 <b>if Detective Bogucki, Detective Schalk, or</b></p> <p>16 <b>Detective Noradin were involved with you in an</b></p> <p>17 <b>interview of Mr. Wade?</b></p> <p>18 A. I do not.</p> <p>19 <b>Q. Do you have an independent recollection</b></p> <p>20 <b>of Detectives Bogucki or Schalk showing Mr. Wade</b></p> <p>21 <b>only one photograph and telling them that the</b></p> <p>22 <b>individual in the photograph was a bad guy?</b></p> <p>23 MR. STARR: Form, foundation, and calls for</p> <p>24 speculation.</p>	Page 115	<p>1 A. Yes. Typically, a witness would be</p> <p>2 shown a photo array with multiple photos.</p> <p>3 <b>Q. Have you ever seen or witnessed a</b></p> <p>4 <b>detective show a witness only one photograph and</b></p> <p>5 <b>indicate that that person was a bad guy?</b></p> <p>6 A. I do not have a recollection of that.</p> <p>7 <b>Q. On the same page over on the left-hand</b></p> <p>8 <b>side under "Incident," can you read what that</b></p> <p>9 <b>says, please?</b></p> <p>10 A. Are you asking about the handwriting</p> <p>11 part of it or all the words?</p> <p>12 <b>Q. I'm sorry. The handwriting part that</b></p> <p>13 <b>starts -- well, it looks like "Incident Summary"</b></p> <p>14 <b>is crossed out, and it says, "continue from</b></p> <p>15 <b>Folder 2."</b></p> <p>16 <b>If you could read starting with what</b></p> <p>17 <b>looks like "warrant"?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Thank you.</b></p> <p>20 A. "Warrant was issued so delta would be</p> <p>21 at A5 and lineups could be run. On 20 Apr 02</p> <p>22 delta's put attorney" -- oh, that may be P-V-T,</p> <p>23 not P-U-T -- "attorney showed up at A5 on</p> <p>24 22 April 02. W3 did not view live lineup as W3</p>
Page 114	<p>1 MR. COYNE: Join.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I do not.</p> <p>4 BY MS. WEST:</p> <p>5 <b>Q. Typically, when a witness is shown a</b></p> <p>6 <b>photo array, does it consist of more than one</b></p> <p>7 <b>photo?</b></p> <p>8 MR. COYNE: I'm sorry. I didn't hear it.</p> <p>9 Was there an answer to the last question?</p> <p>10 (Whereupon, the record was read</p> <p>11 as requested.)</p> <p>12 MR. COYNE: Oh, got you. Thank you. I</p> <p>13 didn't hear it. Sorry, Allyson. I just wanted</p> <p>14 to hear it.</p> <p>15 MS. WEST: No. No worries.</p> <p>16 Can you read the question back? Unless</p> <p>17 you remember it, Ms. Walker, because I --</p> <p>18 BY THE WITNESS:</p> <p>19 A. I believe the -- I believe the question</p> <p>20 was, typically, when a witness is shown a photo</p> <p>21 array, there was more than one photo in it. Is</p> <p>22 that right?</p> <p>23 BY MS. WEST:</p> <p>24 <b>Q. Yes.</b></p>	Page 116	<p>1 didn't get a good look at either of the" -- and</p> <p>2 I believe that says robbers. "Star, other C/I</p> <p>3 files from February and March all from</p> <p>4 ASA Walker 13 Feb 02 55; 9 Mar 02 010;</p> <p>5 16 March 02 040."</p> <p>6 <b>Q. Thank you.</b></p> <p>7 <b>Based on what you just read, let me ask</b></p> <p>8 <b>you a couple questions.</b></p> <p>9 <b>W3, Witness 3, is that Mr. Wade?</b></p> <p>10 A. I don't have an independent</p> <p>11 recollection of creating this document, and I</p> <p>12 don't have an independent recollection of -- of</p> <p>13 the events in it. According -- this -- there is</p> <p>14 no number on the page -- on the right-hand side</p> <p>15 page where Emmett Wade is in the box on this</p> <p>16 paper, reading all these documents together, it</p> <p>17 is likely that the -- that the incident box on</p> <p>18 the left-hand side page is referring to Mr. Wade</p> <p>19 as W3 since it -- since prior sets of documents</p> <p>20 had -- had referred to him as such.</p> <p>21 <b>Q. And based on -- based on that, it</b></p> <p>22 <b>appears that Mr. Wade did not view the live</b></p> <p>23 <b>lineup as documented here; is that right?</b></p> <p>24 MR. COYNE: Foundation.</p>

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<p style="text-align: right;">Page 117</p> <p>1 BY THE WITNESS:</p> <p>2 A. The folder indicates that to be -- the</p> <p>3 document indicates that to be correct. I don't</p> <p>4 have an independent recollection, so I can't say</p> <p>5 what happened.</p> <p>6 BY MS. WEST:</p> <p>7 <b>Q. On that -- after it says on</b></p> <p>8 <b>"20 April 02 defendant's" -- and you read it as</b></p> <p>9 <b>PVT.</b></p> <p>10 <b>Does that stand for private attorney?</b></p> <p>11 A. Typically, PVT would stand for private</p> <p>12 attorney.</p> <p>13 <b>Q. Do you have a recollection of</b></p> <p>14 <b>Mr. Fletcher's attorney showing up for the live</b></p> <p>15 <b>lineup?</b></p> <p>16 A. I do not have a -- a recollection of</p> <p>17 that.</p> <p>18 <b>Q. Is that unusual to have a private</b></p> <p>19 <b>attorney show up for a lineup?</b></p> <p>20 MR. COYNE: Objection, form.</p> <p>21 BY THE WITNESS:</p> <p>22 A. In my experience on Felony Review</p> <p>23 speaking generally, it -- it didn't happen all</p> <p>24 the time, but it did -- it did -- it did happen.</p>	<p style="text-align: right;">Page 119</p> <p>1 <b>conducted, then you don't have an independent</b></p> <p>2 <b>recollection of any misconduct occurring by</b></p> <p>3 <b>Detectives Schalk and Bogucki during the lineup?</b></p> <p>4 MR. COYNE: Objection; form, foundation.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Because --</p> <p>7 MR. STARR: Join.</p> <p>8 BY THE WITNESS:</p> <p>9 A. -- I don't have an independent</p> <p>10 recollection of the lineup, I couldn't say what</p> <p>11 happened at the lineup.</p> <p>12 BY MS. WEST:</p> <p>13 <b>Q. I'm going to indicate to you that in</b></p> <p>14 <b>this case Mr. Fletcher has testified that you</b></p> <p>15 <b>were present at Area 5 when Detective -- one of</b></p> <p>16 <b>the detectives, either Bogucki or Schalk, shoved</b></p> <p>17 <b>him following a lineup.</b></p> <p>18 <b>Do you have a recollection of that</b></p> <p>19 <b>occurring?</b></p> <p>20 MR. STARR: Form and foundation. I believe</p> <p>21 it mischaracterizes facts in evidence.</p> <p>22 But go ahead.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I do not have a recollection of</p>
<p style="text-align: right;">Page 118</p> <p>1 BY MS. WEST:</p> <p>2 <b>Q. And when those attorneys came to the</b></p> <p>3 <b>live lineup, were they allowed on the side where</b></p> <p>4 <b>the witnesses were viewing the lineup?</b></p> <p>5 MR. COYNE: Objection; form, foundation.</p> <p>6 MR. STARR: Join.</p> <p>7 BY MS. WEST:</p> <p>8 <b>Q. Let me back up and put a -- I'm sorry.</b></p> <p>9 <b>Let me put a caveat on it.</b></p> <p>10 <b>At Area 5, did you ever witness a</b></p> <p>11 <b>private attorney view a lineup on the same side</b></p> <p>12 <b>as the witnesses who were also viewing the</b></p> <p>13 <b>lineup?</b></p> <p>14 MR. STARR: Form, foundation, and</p> <p>15 speculation.</p> <p>16 MR. COYNE: Join.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I don't have an independent</p> <p>19 recollection of watching a lineup take place at</p> <p>20 Area 5. I don't have -- so I -- I couldn't say</p> <p>21 either way.</p> <p>22 BY MS. WEST:</p> <p>23 <b>Q. Safe to say that since you don't have</b></p> <p>24 <b>an independent recollection of the lineup being</b></p>	<p style="text-align: right;">Page 120</p> <p>1 something like that happening.</p> <p>2 BY MS. WEST:</p> <p>3 <b>Q. And had something like that happened,</b></p> <p>4 <b>had it -- you witnessed a detective shove an</b></p> <p>5 <b>offender, would you have reported that?</b></p> <p>6 MR. COYNE: Foundation, speculation.</p> <p>7 MR. STARR: Form, foundation, speculation.</p> <p>8 Join.</p> <p>9 BY THE WITNESS:</p> <p>10 A. So to answer that question, I would be</p> <p>11 required to speculate, but I am very mindful of</p> <p>12 my ethical obligations as a prosecutor, and I</p> <p>13 would have acted in accordance with those</p> <p>14 obligations.</p> <p>15 BY MS. WEST:</p> <p>16 <b>Q. All right. Let me show you another</b></p> <p>17 <b>page on the Felony Review.</b></p> <p>18 <b>And, Ms. Walker, please tell me</b></p> <p>19 <b>whenever you need to take that break, okay? I</b></p> <p>20 <b>know we are getting close.</b></p> <p>21 A. Sure. Thank you. I haven't gotten</p> <p>22 my -- I haven't gotten a text yet. So thank</p> <p>23 you.</p> <p>24 <b>Q. Okay. I'm going to direct you to</b></p>

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Page 121	<p>1 page 3039, and the entry is going to be from</p> <p>2 May 8, 2002. All right. All right.</p> <p>3 Have you had an opportunity to pull</p> <p>4 that page in front of you?</p> <p>5 A. Yes. Thank you.</p> <p>6 Q. Oh, okay. Great. It looks like on</p> <p>7 this date it's noted that charges were approved.</p> <p>8 Do you see that?</p> <p>9 A. On -- in the "Charges Action" box on</p> <p>10 the left-hand side, I do see the word</p> <p>11 "approved."</p> <p>12 Q. And under that where it says</p> <p>13 "Statement," I know that you read earlier a</p> <p>14 portion of this, but it looks like it's a more</p> <p>15 full description.</p> <p>16 Can you read for us what it says under</p> <p>17 "Statement Witness"? It starts with ASA Walker.</p> <p>18 A. Yes. "ASA Walker, DET Schalk star --</p> <p>19 or No. 20718, DET Bogucki, No. 20668."</p> <p>20 Do you want me to keep reading?</p> <p>21 Q. Yes, please. Because it goes on there</p> <p>22 and over in the right-hand side too.</p> <p>23 A. Yes. "Delta AOR. Delta waived. In</p> <p>24 summary, delta stated he wasn't there and didn't</p>	Page 123	<p>1 even though he was in prison under the name of</p> <p>2 Arnold" -- and I think that's Dixon -- "his real</p> <p>3 name was James Fletcher."</p> <p>4 I'm sorry. I think I was jumping</p> <p>5 between the screen and my paper, and I missed</p> <p>6 that line. I apologize.</p> <p>7 Q. No. No worries. Thank you.</p> <p>8 And this summary, from what it appears</p> <p>9 on the document here, is a summary of a</p> <p>10 statement from Mr. Fletcher; is that correct?</p> <p>11 MR. COYNE: Objection, foundation.</p> <p>12 BY THE WITNESS:</p> <p>13 A. So I don't have any independent</p> <p>14 recollection of creating this document -- even</p> <p>15 though the handwriting looks like it could be</p> <p>16 mine -- that -- or speaking with James Fletcher</p> <p>17 or taking the statement, but the words on the</p> <p>18 page -- that's what the words on the page say.</p> <p>19 BY MS. WEST:</p> <p>20 Q. Let me take you to 3037. All right.</p> <p>21 Witness No. 1, Terry Rogers.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Thank you. Over on the</p>
Page 122	<p>1 know anything about it. Delta did not know what</p> <p>2 he was doing on December 21, 1990, but he stated</p> <p>3 he knew he was not around Madison and Central.</p> <p>4 Delta stated that" -- I can't read that word --</p> <p>5 "December of 1990 he was selling dope at Cabrini</p> <p>6 Green and had no reason to be sticking people</p> <p>7 up" -- I can't read that word.</p> <p>8 "He had a lot of" -- and then</p> <p>9 continuing over to the left -- to the right-hand</p> <p>10 side -- "paren, CONT, closed paren, money coming</p> <p>11 from his dope business. He was in prison under</p> <p>12 the name of Arnold" -- I think that says Dixon.</p> <p>13 "His real name was James Fletcher."</p> <p>14 Q. Thank you. And maybe I miss -- missed</p> <p>15 this part.</p> <p>16 But did you read the part where it</p> <p>17 says, "defendant stated he knew Terry Rogers"?</p> <p>18 A. Oh, I'm sorry. I missed --</p> <p>19 Q. No, no. You're fine.</p> <p>20 A. I think I skipped -- I was looking back</p> <p>21 and forth, and I think I skipped a line.</p> <p>22 So on the right-hand side it says,</p> <p>23 "(CONT) money coming from his dope business.</p> <p>24 Delta stated he knew Terry Rogers. Delta stated</p>	Page 124	<p>1 right-hand side, it looks like it says, "W1 is</p> <p>2 very hostile" with an exclamation point.</p> <p>3 Do you see that?</p> <p>4 A. Yes. I see those words.</p> <p>5 Q. Okay. Do you recall Mr. Rogers being a</p> <p>6 hostile witness?</p> <p>7 A. I don't have an independent</p> <p>8 recollection of creating this document. I don't</p> <p>9 have an independent recollection of speaking</p> <p>10 with a Terry Rogers.</p> <p>11 Q. Under "Notes," does it appear that</p> <p>12 Mr. Rogers was interviewed on February 13, 2002?</p> <p>13 A. The document indicates there was an</p> <p>14 interview by -- the document indicates</p> <p>15 "interview by ASA Walker 13 February 02." I</p> <p>16 don't have an independent recollection of this</p> <p>17 or creating -- of that incident or of creating</p> <p>18 this document. I -- I can't say.</p> <p>19 Q. And also based on this document and</p> <p>20 what's noted here, it looks like there was a</p> <p>21 positive identification of a photo array by</p> <p>22 Terry Rogers as well?</p> <p>23 A. The document indicates that there was a</p> <p>24 positive identification. I don't have an</p>

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<p style="text-align: right;">Page 125</p> <p>1 independent recollection of that.</p> <p>2 <b>Q. And then also based on the notes, it</b></p> <p>3 <b>indicates that Mr. Rogers gave a handwritten</b></p> <p>4 <b>statement on May 8, 2002; is that right?</b></p> <p>5 A. The document indicates an "HW," which</p> <p>6 I -- generally would refer to a handwritten</p> <p>7 statement taken on May 8th, yes. That's what</p> <p>8 the document says.</p> <p>9 MS. WEST: Okay. All right. I'm going to</p> <p>10 show you what we'll mark as Exhibit 4. And for</p> <p>11 the record, this is going to be the handwritten</p> <p>12 statement of Terry Rogers. All right. And also</p> <p>13 for the record, it's City-JF-161 through 163.</p> <p>14 (Whereupon, Walker Deposition</p> <p>15 Exhibit No. 4 was marked for</p> <p>16 identification.)</p> <p>17 BY MS. WEST:</p> <p>18 <b>Q. All right. Ms. Walker, do you have</b></p> <p>19 <b>this document in front of you?</b></p> <p>20 A. I do.</p> <p>21 <b>Q. Okay. Based on this document, what</b></p> <p>22 <b>detective was present for the handwritten</b></p> <p>23 <b>statement of Mr. Rogers?</b></p> <p>24 MR. STARR: Form, foundation. Calls for</p>	<p style="text-align: right;">Page 127</p> <p>1 <b>Q. And it was taken at Area 5.</b></p> <p>2 <b>Do you see that?</b></p> <p>3 A. That's what the document states.</p> <p>4 <b>Q. Okay. And, Ms. Walker, let me ask you</b></p> <p>5 <b>this: Have you had a chance to read through</b></p> <p>6 <b>this statement to yourself prior to -- to now?</b></p> <p>7 A. I read through this -- through this</p> <p>8 within the last week, yes.</p> <p>9 <b>Q. Okay. Where I'm getting at is so that</b></p> <p>10 <b>I -- I don't have to make you read this into the</b></p> <p>11 <b>record, are you familiar with it enough that I</b></p> <p>12 <b>can ask you some questions about it, or would</b></p> <p>13 <b>you like some time to read through it again?</b></p> <p>14 A. Go ahead and ask me some questions, and</p> <p>15 if I need to read it, I'll read.</p> <p>16 <b>Q. Sounds good.</b></p> <p>17 <b>Based on Mr. Rogers's statement, he --</b></p> <p>18 <b>he identifies an individual in an Exhibit A as</b></p> <p>19 <b>James Fletcher.</b></p> <p>20 <b>Would you agree with that?</b></p> <p>21 A. The statement indicates that there's an</p> <p>22 Exhibit A. I don't have a copy of Exhibit A as</p> <p>23 a part of the document that I reviewed. And in</p> <p>24 the -- in the -- the statement says that Terry</p>
<p style="text-align: right;">Page 126</p> <p>1 speculation.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I reviewed this document to prepare for</p> <p>4 my testimony here today. I recognize that the</p> <p>5 handwriting on here looks like mine, but I don't</p> <p>6 have any independent recollection -- or of</p> <p>7 creating this document or speaking with Terry</p> <p>8 Rogers. So I can't -- I can't testify as to</p> <p>9 what happened. Looking at this document and</p> <p>10 knowing -- you know, and considering like how</p> <p>11 things typically worked, it appears that</p> <p>12 detective -- and my copy is kind of cut off.</p> <p>13 It appears that it was Detective</p> <p>14 Norad- -- I'm guessing Noradin. This looks like</p> <p>15 Noradiv [sic], but it also looks like part of</p> <p>16 that got cut off, so --</p> <p>17 BY MS. WEST:</p> <p>18 <b>Q. Okay. And --</b></p> <p>19 A. -- I can't say for sure.</p> <p>20 <b>Q. Okay. And based on this document,</b></p> <p>21 <b>what's noted on the document is the statement</b></p> <p>22 <b>was taken on May 8, 2002.</b></p> <p>23 <b>Do you see that?</b></p> <p>24 A. That's what the document states.</p>	<p style="text-align: right;">Page 128</p> <p>1 states that Exhibit A is someone he knows as</p> <p>2 Fletcher.</p> <p>3 <b>Q. And I know that you already gave the</b></p> <p>4 <b>caveat that you aren't familiar with this</b></p> <p>5 <b>document. You don't have a recollection of</b></p> <p>6 <b>taking Mr. Rogers's statement.</b></p> <p>7 <b>Is this document in your handwriting?</b></p> <p>8 A. This document looks like it could be my</p> <p>9 writing, but because I don't remember making it</p> <p>10 or having a conversation with Mr. Rogers, I</p> <p>11 can't say that it is for sure in my writing.</p> <p>12 <b>Q. And Mr. Rogers -- in the handwritten</b></p> <p>13 <b>statement what is documented is that he has</b></p> <p>14 <b>known Fletcher since they were kids, and they</b></p> <p>15 <b>used to go to the same roller-stating place.</b></p> <p>16 <b>Do you agree with that?</b></p> <p>17 A. That's what the document says at the</p> <p>18 bottom of page 2.</p> <p>19 <b>Q. And based on this statement, how did</b></p> <p>20 <b>Mr. Rogers report that he had been treated by</b></p> <p>21 <b>the police?</b></p> <p>22 A. According to the document, it states,</p> <p>23 "Terry states he's been treated okay by the</p> <p>24 police and by Assistant State's Attorney</p>



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Page 129	<p>1 Jennifer Walker." But I have no independent</p> <p>2 recollection of the statement or of making it --</p> <p>3 writing it down.</p> <p>4 <b>Q. And based on the document, Mr. Rogers</b></p> <p>5 <b>also indicates that no threats or promises had</b></p> <p>6 <b>been made for giving the statement.</b></p> <p>7 A. The document states he was not made --</p> <p>8 that "Terry was not made any threats or promises</p> <p>9 and is giving the statement freely and</p> <p>10 voluntarily."</p> <p>11 <b>Q. At the bottom of this third page here,</b></p> <p>12 <b>it looks like there's three signatures under the</b></p> <p>13 <b>last sentence.</b></p> <p>14 <b>The third signature, does that appear</b></p> <p>15 <b>to be your signature?</b></p> <p>16 A. I don't remember signing this document.</p> <p>17 It looks similar to my writing. But I can't say</p> <p>18 that it is my signature, because I don't</p> <p>19 remember signing it.</p> <p>20 MS. WEST: All right. I'm going to show you</p> <p>21 what we will mark as Exhibit 5. For the record,</p> <p>22 this is the transcript of Terry Rogers's</p> <p>23 testimony to the grand jury taken on May 9,</p> <p>24 2002. And it's Bates Fletcher 007762 through</p>	Page 131	<p>1 jury unless there has been the appropriate order</p> <p>2 from the criminal court releasing the -- those</p> <p>3 materials.</p> <p>4 So I just want to caution you of that.</p> <p>5 I don't know that it has. There was a</p> <p>6 conversation on the record earlier. And I have</p> <p>7 not seen an order from the criminal court judge</p> <p>8 at 26th Street, Judge Reddick. I haven't heard</p> <p>9 of the order being issued, so you ought to know</p> <p>10 that.</p> <p>11 MR. HOLMES: Same -- same admonition on</p> <p>12 behalf of the Office.</p> <p>13 MS. WEST: All right. Let me stop this for a</p> <p>14 second, so we can talk about this.</p> <p>15 Sean, I obviously haven't -- haven't</p> <p>16 had the chance to look. I don't know if you</p> <p>17 have that order.</p> <p>18 MR. STARR: I asked my paralegal take a look,</p> <p>19 and she couldn't find it. It doesn't mean it</p> <p>20 doesn't -- that we don't have one. I just --</p> <p>21 you know, my focus has been on this deposition.</p> <p>22 MS. WEST: Yeah, absolutely.</p> <p>23 MR. STARR: I haven't had time to look in my</p> <p>24 files.</p>
Page 130	<p>1 7768.</p> <p>2 (Whereupon, Walker Deposition</p> <p>3 Exhibit No. 5 was marked for</p> <p>4 identification.)</p> <p>5 BY MS. WEST:</p> <p>6 <b>Q. Ms. Walker, was that -- was this</b></p> <p>7 <b>document among the documents that you reviewed</b></p> <p>8 <b>in preparation for today's deposition?</b></p> <p>9 MR. COYNE: Yeah. Let me -- let me just</p> <p>10 interject. Jennifer, just -- we talked about</p> <p>11 the Grand Jury Secrecy Act earlier. So I just</p> <p>12 want to caution you that according to the Act it</p> <p>13 is illegal for you to reveal the identity of</p> <p>14 witnesses or evidence that was presented to a</p> <p>15 grand jury unless there was the required order</p> <p>16 from the criminal court that alleviated the</p> <p>17 witness, in this case you, of that obligation</p> <p>18 not to do so.</p> <p>19 So I don't know if that's been -- if</p> <p>20 that's happened. So just in terms of</p> <p>21 representing your interests, I would caution you</p> <p>22 that you may find -- you may face some sort of</p> <p>23 jeopardy should you reveal the identity of</p> <p>24 testimony or witnesses presented to this grand</p>	Page 132	<p>1 MS. WEST: And for everyone on here, I can</p> <p>2 indicate to you that these documents have been</p> <p>3 produced in litigation by plaintiff's office,</p> <p>4 and that they have been used in other</p> <p>5 depositions.</p> <p>6 BY MS. WEST:</p> <p>7 <b>Q. So, Ms. Walker, let me ask you this:</b></p> <p>8 <b>What's your comfort level as to testifying to</b></p> <p>9 <b>these without actually putting your eyes on the</b></p> <p>10 <b>order?</b></p> <p>11 MR. COYNE: Yeah. Let me just counsel her on</p> <p>12 that, Jennifer, because I'm here for that</p> <p>13 reason. All right. I understand that they've</p> <p>14 been released. That's clear. I also am not</p> <p>15 aware of any exception in the Grand Jury Secrecy</p> <p>16 Act that would protect you from potential</p> <p>17 jeopardy based upon the fact that the materials</p> <p>18 were released, unless there was a criminal court</p> <p>19 order that has been issued in this case that</p> <p>20 would permit you to answer these questions. And</p> <p>21 you ought to know that.</p> <p>22 So I'm just cautioning you accordingly.</p> <p>23 I haven't seen the order. There's been no</p> <p>24 representation of any attorney in this</p>

36 (Pages 129 to 132)

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Page 133	<p>1 deposition that there was such an order, much</p> <p>2 less that they saw it. So I would caution you</p> <p>3 that -- absent confirmation that an order has</p> <p>4 been issued, I would caution you not to answer</p> <p>5 any questions given the jeopardy that you may or</p> <p>6 could face under the express terms of the Grand</p> <p>7 Jury Secrecy Act.</p> <p>8 MR. HOLMES: Same admonition on behalf of the</p> <p>9 Office.</p> <p>10 BY THE WITNESS:</p> <p>11 A. So I can say that I read this exhibit</p> <p>12 in preparation for my testimony here today, but</p> <p>13 as I have not seen an order releasing this -- I</p> <p>14 see it has been -- you-all have it. But I</p> <p>15 haven't seen the order saying that it's okay to</p> <p>16 talk about this. And I certainly don't -- am</p> <p>17 not suggesting that someone is trying to do</p> <p>18 something improper, I -- but for my own comfort</p> <p>19 level, I would need to see the order in order to</p> <p>20 speak on this.</p> <p>21 MS. WEST: Understood. How about this? I'm</p> <p>22 gonna skip forward. Actually, you know what?</p> <p>23 Can we take just a five-minute break,</p> <p>24 because I am going to have my office look for it</p>	Page 135	<p>1 just want to know for planning purposes. Thank</p> <p>2 you.</p> <p>3 MS. WEST: Okay. John, how long would you</p> <p>4 like.</p> <p>5 MR. COYNE: Why don't we say ten minutes?</p> <p>6 MS. WEST: Okay.</p> <p>7 MR. COYNE: That should be enough.</p> <p>8 MS. WEST: Sounds good. Okay. Thank you.</p> <p>9 MR. STARR: Sounds good. Thanks.</p> <p>10 MS. WEST: We'll come back at 1:50.</p> <p>11 (Whereupon, a short break was</p> <p>12 taken.)</p> <p>13 MS. WEST: Let's go -- I'm going to show you</p> <p>14 what we'll mark as Exhibit 6. I'm sorry. Wait.</p> <p>15 It's going to be 5.</p> <p>16 THE COURT REPORTER: You have the grand jury</p> <p>17 transcript marked as 5.</p> <p>18 MS. WEST: Ah, okay. That's why. Thank you.</p> <p>19 Okay. So the grand jury for Rogers is 5?</p> <p>20 THE COURT REPORTER: Correct.</p> <p>21 MS. WEST: Okay. So then we'll do 6. All</p> <p>22 right. 6, for the record, is the Declaration of</p> <p>23 Emmett Wade. And for the record, it's -- let's</p> <p>24 do CCSAO-CUI 00152 through 157.</p>
Page 134	<p>1 as well. And then we'll go on, and I'll finish</p> <p>2 up what I have with you, and then if we can come</p> <p>3 to this, we will.</p> <p>4 MR. COYNE: Yeah. Let's -- Allyson, let's</p> <p>5 make that break a little longer because I'm</p> <p>6 going to need to address some things here so I'm</p> <p>7 not interrupted. And then you said about 2:00.</p> <p>8 I know that obviously is not written in stone,</p> <p>9 but, Sean, do you know approximately how much</p> <p>10 time you're going to need for planning purposes</p> <p>11 on our end?</p> <p>12 MR. STARR: I'm going to say that I'm still</p> <p>13 at approximately an hour, an hour and a half.</p> <p>14 You know, I will do my best to get through my</p> <p>15 outline as efficiently as possible.</p> <p>16 MR. COYNE: Okay.</p> <p>17 MR. STARR: And also it depends on what</p> <p>18 questions get asked between now and then.</p> <p>19 MR. COYNE: Does anyone else have -- expect</p> <p>20 to have questions that would affect the length</p> <p>21 of the deposition?</p> <p>22 MR. BURNS: At this time, I don't expect to</p> <p>23 have any questions. That may change, though.</p> <p>24 MR. COYNE: Okay. Thank you. Just so we --</p>	Page 136	<p>1 (Whereupon, Walker Deposition</p> <p>2 Exhibit No. 6 was marked for</p> <p>3 identification.)</p> <p>4 BY MS. WEST:</p> <p>5 <b>Q. All right. Ms. Walker, do you have</b></p> <p>6 <b>this document in front of you?</b></p> <p>7 A. I do.</p> <p>8 <b>Q. Okay. Good. For context, Emmett Wade</b></p> <p>9 <b>was a witness that we spoke about earlier that</b></p> <p>10 <b>was documented in the Felony Review folder as</b></p> <p>11 <b>the individual who said he didn't have a good</b></p> <p>12 <b>look at the robbers.</b></p> <p>13 <b>Do you recall reading those notes?</b></p> <p>14 A. I do recall that.</p> <p>15 <b>Q. Okay. Safe to say, Ms. Walker, you</b></p> <p>16 <b>have not seen this document before today?</b></p> <p>17 A. Well, it was --</p> <p>18 <b>Q. Or before being provided it?</b></p> <p>19 A. It -- prior to preparing for the</p> <p>20 deposition, I had not seen it. But it -- I did</p> <p>21 get it from John's office. So -- so I had seen</p> <p>22 it before today.</p> <p>23 <b>Q. Okay. Did you have an opportunity to</b></p> <p>24 <b>read through it prior to today?</b></p>

37 (Pages 133 to 136)

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Page 137	<p>1 A. I -- I did. I had trouble reading some</p> <p>2 of the -- of the writing. So I wouldn't say</p> <p>3 that I was able to read every word, but I have</p> <p>4 read through this. There is just some words I</p> <p>5 couldn't get.</p> <p>6 <b>Q. Okay. I want to direct your attention</b></p> <p>7 <b>specifically to a few things.</b></p> <p>8 <b>So on page 2 of the document -- for the</b></p> <p>9 <b>Bates range it's 153 -- this -- it's like the</b></p> <p>10 <b>first full paragraph in the middle of the page.</b></p> <p>11 <b>If you could just read that paragraph to</b></p> <p>12 <b>yourself, and then let me know when you're</b></p> <p>13 <b>finished. I want to ask you a question.</b></p> <p>14 A. I have read it.</p> <p>15 <b>Q. Thank you. Based on the paragraph that</b></p> <p>16 <b>you just read, Mr. Wade is claiming that</b></p> <p>17 <b>detectives came to see him at his house, and</b></p> <p>18 <b>that they would return with the state's attorney</b></p> <p>19 <b>and come back in a few days.</b></p> <p>20 <b>Was that your reading of that</b></p> <p>21 <b>paragraph?</b></p> <p>22 A. I would say that's the gist. Again,</p> <p>23 there is -- there's some words here that are</p> <p>24 difficult to read and for me to know with</p>	Page 139	<p>1 <b>yourself the rest of this paragraph, and then it</b></p> <p>2 <b>proceeds onto the following page.</b></p> <p>3 MR. STARR: What page are you on? I'm sorry.</p> <p>4 MS. WEST: Sure. It was page 2 into 3 or</p> <p>5 Bates 153 into 154.</p> <p>6 MR. STARR: Thanks.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I read that paragraph.</p> <p>9 BY MS. WEST:</p> <p>10 <b>Q. Okay. Thank you.</b></p> <p>11 <b>In that paragraph Mr. Wade is saying</b></p> <p>12 <b>that he was shown one photograph by the</b></p> <p>13 <b>detectives in the presence of a State's</b></p> <p>14 <b>Attorney. Do you agree with that?</b></p> <p>15 MR. COYNE: Foundation.</p> <p>16 BY THE WITNESS:</p> <p>17 A. That's what the document says.</p> <p>18 BY MS. WEST:</p> <p>19 <b>Q. Okay.</b></p> <p>20 A. It -- again, having trouble reading it,</p> <p>21 but that's the gist of what I -- I read the gist</p> <p>22 of that in the document.</p> <p>23 <b>Q. Okay. And Mr. Wade is also saying that</b></p> <p>24 <b>the detective told him that "the individual in</b></p>
Page 138	<p>1 certainty what they are.</p> <p>2 <b>Q. Okay. Excuse me. I'm going to move</b></p> <p>3 <b>down on to the next paragraph, and I am just</b></p> <p>4 <b>going to read this to you.</b></p> <p>5 <b>"The officers called me a couple days</b></p> <p>6 <b>later and asked me what a good time would be for</b></p> <p>7 <b>them to come -- to come back. I told them, and</b></p> <p>8 <b>they came back with a tall, slender female</b></p> <p>9 <b>State's Attorney."</b></p> <p>10 <b>Do you have an independent recollection</b></p> <p>11 <b>of meeting with Mr. Wade at his home with the</b></p> <p>12 <b>detectives?</b></p> <p>13 A. I do not.</p> <p>14 <b>Q. Would it have been unusual to visit a</b></p> <p>15 <b>witness at the their home?</b></p> <p>16 MR. COYNE: Form.</p> <p>17 BY THE WITNESS:</p> <p>18 A. While I was on Felony Review, I do</p> <p>19 remember visiting -- going to a -- houses to</p> <p>20 speak -- residences to speak with witnesses. It</p> <p>21 was more the exception than the rule, though.</p> <p>22 BY MS. WEST:</p> <p>23 <b>Q. I'm going to scroll on down here.</b></p> <p>24 <b>Actually, let me have you read to</b></p>	Page 140	<p>1 <b>the photograph was a bad guy and that we want to</b></p> <p>2 <b>keep him off the street."</b></p> <p>3 <b>Do you see that?</b></p> <p>4 MR. COYNE: Objection, foundation as to</p> <p>5 Mr. Wade.</p> <p>6 Go ahead.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I -- I think I see "a bad," but -- but</p> <p>9 I -- it's -- I think that's what that says, yes.</p> <p>10 BY MS. WEST:</p> <p>11 <b>Q. Okay. On down -- and I will read. It</b></p> <p>12 <b>says, "The lady attorney agreed that he was a</b></p> <p>13 <b>bad guy, and that he did" -- I think it says</b></p> <p>14 <b>this -- "type of thing."</b></p> <p>15 <b>Do you see that?</b></p> <p>16 A. I do see those words.</p> <p>17 <b>Q. Okay. Do you have a recollection of</b></p> <p>18 <b>ever telling a witness that an offender was a</b></p> <p>19 <b>bad guy?</b></p> <p>20 A. I do not have a recollection of that.</p> <p>21 <b>Q. Would you have ever singled out an</b></p> <p>22 <b>offender by photograph and told a witness that</b></p> <p>23 <b>that was a bad guy?</b></p> <p>24 MR. COYNE: Objection; form, foundation.</p>



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Page 141	<p>1 MR. STARR: Form, foundation, speculation.</p> <p>2 BY THE WITNESS:</p> <p>3 A. Because I don't remember meeting with</p> <p>4 or having a conversation with Emmett Wade, I</p> <p>5 can't answer the question, but I -- I can't say,</p> <p>6 you know, yes or no. But I -- I can say that I</p> <p>7 am mindful of my obligations as a prosecutor,</p> <p>8 and I act in accordance with those obligations.</p> <p>9 BY MS. WEST:</p> <p>10 <b>Q. And by acting in accordance with those</b></p> <p>11 <b>obligations, you would not tell a witness that a</b></p> <p>12 <b>possible offender was a bad guy, correct?</b></p> <p>13 MR. STARR: Form, foundation.</p> <p>14 MR. COYNE: Objection; form, foundation.</p> <p>15 Incomplete hypothetical. Requires the witness</p> <p>16 to speculate.</p> <p>17 MR. STARR: Join.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I would again say that I am mindful of</p> <p>20 my obligations as a prosecutor, and I would act</p> <p>21 in accordance with those obligations. But I</p> <p>22 can't -- the question as asked would require me</p> <p>23 to speculate.</p> <p>24 BY MS. WEST:</p>	Page 143	<p>1 <b>Q. Based on your ethical obligations while</b></p> <p>2 <b>you were on Felony Review or assistant state's</b></p> <p>3 <b>attorney, if you were interviewing a witness</b></p> <p>4 <b>prior to charges being brought, prior to that</b></p> <p>5 <b>witness identifying an offender, would you ever</b></p> <p>6 <b>single out a photograph of a possible offender</b></p> <p>7 <b>and tell that witness that that individual in</b></p> <p>8 <b>that specific photograph was a bad guy?</b></p> <p>9 MR. COYNE: Objection; form, foundation.</p> <p>10 Incomplete hypothetical. Requires the witness</p> <p>11 to speculate.</p> <p>12 MR. STARR: Join.</p> <p>13 Go ahead.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I again can't answer that based --</p> <p>16 because it would require me to speculate. But</p> <p>17 again, I am -- I am -- I am mindful of my</p> <p>18 obligations as a -- obligations as a prosecutor.</p> <p>19 I would act in accordance with those</p> <p>20 obligations. I would not taint an</p> <p>21 identification.</p> <p>22 MS. WEST: I'm going to show you what we will</p> <p>23 mark as Exhibit 7. All right. For the record,</p> <p>24 this is the affidavit of Edward Cooper, which is</p>
Page 142	<p>1 <b>Q. Based on your obligations, would it be</b></p> <p>2 <b>improper to tell a witness that an offender was</b></p> <p>3 <b>a bad guy?</b></p> <p>4 MR. COYNE: Can I hear that question again,</p> <p>5 Madam Court Reporter? I didn't hear the</p> <p>6 beginning.</p> <p>7 (Whereupon, the record was read</p> <p>8 as requested.)</p> <p>9 MR. COYNE: Objection; form, foundation.</p> <p>10 Incomplete hypothetical.</p> <p>11 BY THE WITNESS:</p> <p>12 A. So it would -- it would call -- it is</p> <p>13 still speculation. It depends on are we talking</p> <p>14 about, you know, a witness during an</p> <p>15 investigation stage? Are we talking about a</p> <p>16 witness after there has been a verdict in a</p> <p>17 trial? Are we talking about -- you know, I --</p> <p>18 there is a lot of situations here.</p> <p>19 And based on your question, because it</p> <p>20 calls for speculation, I can't answer it. But I</p> <p>21 again say that I'm mindful of my obligations as</p> <p>22 a prosecutor, and I -- I would -- would act in</p> <p>23 accordance with those ethical obligations.</p> <p>24 BY MS. WEST:</p>	Page 144	<p>1 Bates-stamped Fletcher 425 through 426.</p> <p>2 (Whereupon, Walker Deposition</p> <p>3 Exhibit No. 7 was marked for</p> <p>4 identification.)</p> <p>5 BY MS. WEST:</p> <p>6 <b>Q. Ms. Walker, do you see the document in</b></p> <p>7 <b>front of you?</b></p> <p>8 A. I see that document. I do not remember</p> <p>9 getting that ahead of time to read over. So I</p> <p>10 have not read this document.</p> <p>11 <b>Q. Okay. I want to direct you to two</b></p> <p>12 <b>specific paragraphs, but I would also like to</b></p> <p>13 <b>give you the opportunity if you would like to</b></p> <p>14 <b>read the document in its entirety. Just let me</b></p> <p>15 <b>know.</b></p> <p>16 A. I finished reading paragraph 7.</p> <p>17 <b>Q. Okay. Let me scroll down for you.</b></p> <p>18 A. I finished reading what's on the</p> <p>19 screen.</p> <p>20 <b>Q. Okay. Just a little bit left. Sorry</b></p> <p>21 <b>to --</b></p> <p>22 A. I finished.</p> <p>23 <b>Q. Okay. Thank you. All right. I want</b></p> <p>24 <b>to direct your attention to paragraph 8 and 9</b></p>

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<p style="text-align: right;">Page 145</p> <p>1 specifically.</p> <p>2 Based on the notes that we have</p> <p>3 previously reviewed today at your deposition and</p> <p>4 that you reviewed prior to the deposition in the</p> <p>5 Felony Review folders, Edward Cooper positively</p> <p>6 identified Mr. Fletcher in a photo array,</p> <p>7 correct?</p> <p>8 MR. STARR: Form, foundation, speculation.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I believe that's what those Felony</p> <p>11 Review documents stated in them.</p> <p>12 BY MS. WEST:</p> <p>13 Q. And the Felony Review documents also</p> <p>14 indicated that Mr. Cooper positively identified</p> <p>15 the offender, Mr. Fletcher, at the lineup,</p> <p>16 correct?</p> <p>17 MR. STARR: Same objections.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I believe -- I believe that's what the</p> <p>20 documents indicated -- or I believe that's what</p> <p>21 was stated on the documents.</p> <p>22 BY MS. WEST:</p> <p>23 Q. Okay. Did -- based on Mr. Cooper's</p> <p>24 statement in paragraph 8, do you have a</p>	<p style="text-align: right;">Page 147</p> <p>1 And just to clear one thing up, at the time I</p> <p>2 was in Felony Review I was married. I am still</p> <p>3 married, same guy. I never changed my name.</p> <p>4 There are people who socially refer to me by my</p> <p>5 husband's name, but that's not my legal name,</p> <p>6 but I do respond to it if I am called that. So</p> <p>7 just to be extra clear.</p> <p>8 Q. No. Thank you. And any time --</p> <p>9 A. And it's not Gonzalez. His name is not</p> <p>10 Gonzalez.</p> <p>11 Q. Thank you. At any time that you would</p> <p>12 have documented work as an assistant state's</p> <p>13 attorney, you would have noted Jennifer Walker?</p> <p>14 A. I specifically did not change my name</p> <p>15 so I did not have to spell his last name for</p> <p>16 court reporters. I only use my name in -- for</p> <p>17 work.</p> <p>18 Q. Okay. Thank you. Based on the Felony</p> <p>19 Review notes, Ms. Friend gave a positive</p> <p>20 identification of the offender, Mr. Fletcher,</p> <p>21 based off of a photo array, correct?</p> <p>22 MR. STARR: Form, foundation, speculation.</p> <p>23 BY THE WITNESS:</p> <p>24 A. That is what the documents indicate.</p>
<p style="text-align: right;">Page 146</p> <p>1 recollection of him refusing to appear before</p> <p>2 the grand jury?</p> <p>3 A. I don't have a recollection of</p> <p>4 speaking -- an independent recollection of</p> <p>5 speaking with Mr. Cooper, and I don't have an</p> <p>6 independent recollection of him refusing to go</p> <p>7 to the grand jury.</p> <p>8 Q. This might take care of one of the</p> <p>9 grand jury documents I wanted to show you.</p> <p>10 Do you know an individual -- assistant</p> <p>11 state's attorney by the name of Jennifer</p> <p>12 Gonzalez?</p> <p>13 A. I know Jennifer Gonzalez who used to be</p> <p>14 an ASA, yes.</p> <p>15 Q. Okay. Let me ask you this just to</p> <p>16 clear this up for me: Have you ever gone by any</p> <p>17 other name other than Jennifer Walker?</p> <p>18 A. No, that's -- no, I have not.</p> <p>19 Q. Okay. And at the time that you were in</p> <p>20 Felony Review in -- from 2001 to I believe you</p> <p>21 said 2003, was there another assistant state's</p> <p>22 attorney in Felony Review by the name of</p> <p>23 Jennifer Walker?</p> <p>24 A. I don't believe that to be the case.</p>	<p style="text-align: right;">Page 148</p> <p>1 BY MS. WEST:</p> <p>2 Q. And then based on the handwritten</p> <p>3 statement that we reviewed earlier, Ms. Friend</p> <p>4 again positively identified the offender,</p> <p>5 Mr. Fletcher, in her handwritten statement?</p> <p>6 A. That is --</p> <p>7 MR. STARR: Same objections.</p> <p>8 MR. COYNE: Objection, form.</p> <p>9 BY THE WITNESS:</p> <p>10 A. That's what's written in the statement.</p> <p>11 BY MS. WEST:</p> <p>12 Q. And again, based on the Felony Review</p> <p>13 folder, Mr. Rogers identified positively the</p> <p>14 offender, Mr. Fletcher, based on a photo array,</p> <p>15 correct?</p> <p>16 MR. STARR: Same objections.</p> <p>17 BY THE WITNESS:</p> <p>18 A. That is what -- what is written in the</p> <p>19 document.</p> <p>20 BY MS. WEST:</p> <p>21 Q. And again, based on the handwritten</p> <p>22 statement of Terry Rogers, he further identified</p> <p>23 Mr. Fletcher as an offender as well?</p> <p>24 MR. STARR: Same objections.</p>

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<p style="text-align: right;">Page 149</p> <p>1 BY THE WITNESS:</p> <p>2 A. That is what's written in the</p> <p>3 statement.</p> <p>4 BY MS. WEST:</p> <p>5 <b>Q. Based on the Felony Review folder,</b></p> <p>6 <b>Mr. Cooper positively identified Mr. Fletcher --</b></p> <p>7 <b>strike that. I already asked you that question.</b></p> <p>8 <b>Based on the Felony Review folder, can</b></p> <p>9 <b>you tell if you interviewed or someone</b></p> <p>10 <b>interviewed Mr. Wade more than one time?</b></p> <p>11 MR. STARR: Form, foundation, speculation.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Based on the Felony Review folder</p> <p>14 documents, they indicate -- they seem to</p> <p>15 indicate that Wade was interviewed on</p> <p>16 March 16th, but there is -- there is two entries</p> <p>17 indicating that Wade was interviewed on</p> <p>18 March 16th, and there is one entry that just</p> <p>19 says he was interviewed and does not give a</p> <p>20 date. So I'm not -- I'm not sure.</p> <p>21 BY MS. WEST:</p> <p>22 <b>Q. Thank you.</b></p> <p>23 A. According to the -- just looking on the</p> <p>24 documents, because I still have no personal</p>	<p style="text-align: right;">Page 151</p> <p>1 <b>your attorney, which I don't want to know about,</b></p> <p>2 <b>did you speak with anyone else in preparation</b></p> <p>3 <b>for your deposition today?</b></p> <p>4 A. I have had to tell multiple people that</p> <p>5 I was being deposed, but I have not spoken about</p> <p>6 the substance of my -- of my testimony with</p> <p>7 anyone other than my attorney.</p> <p>8 <b>Q. Are you aware of Mr. Fletcher's</b></p> <p>9 <b>criminal conviction being overturned?</b></p> <p>10 MR. COYNE: Jennifer, you can answer the</p> <p>11 question provided you don't need to disclose our</p> <p>12 attorney-client communications.</p> <p>13 THE WITNESS: I -- I have heard that, yes.</p> <p>14 BY MS. WEST:</p> <p>15 <b>Q. Okay. And are you aware that</b></p> <p>16 <b>Mr. Fletcher sought a certificate of innocence</b></p> <p>17 <b>following his conviction being vacated?</b></p> <p>18 MR. COYNE: Same instruction.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I believe so.</p> <p>21 BY MS. WEST:</p> <p>22 <b>Q. Are you aware that the State's Attorney</b></p> <p>23 <b>Office took no -- no position at Mr. Fletcher's</b></p> <p>24 <b>hearing on his motion for a certificate of</b></p>
<p style="text-align: right;">Page 150</p> <p>1 recollection of that.</p> <p>2 <b>Q. Prior to today's deposition, did you</b></p> <p>3 <b>speak with any attorneys who indicated that they</b></p> <p>4 <b>represent Mr. Fletcher?</b></p> <p>5 A. I don't think so.</p> <p>6 <b>Q. Meaning, prior to today's deposition,</b></p> <p>7 <b>did you speak with anyone from the law firm of</b></p> <p>8 <b>Loevy &amp; Loevy?</b></p> <p>9 A. If I have spoken with anyone from</p> <p>10 Loevy &amp; Loevy, it has not been about this case,</p> <p>11 I may have spoken to them about a different</p> <p>12 case. I'm not sure who all they represent, but</p> <p>13 I don't remember speaking to anyone from</p> <p>14 Loevy &amp; Loevy about the -- the Fletcher case.</p> <p>15 <b>Q. Prior to today's deposition, did you</b></p> <p>16 <b>have any conversations with an attorney Jennifer</b></p> <p>17 <b>Blagg about Mr. Fletcher's case and the fact</b></p> <p>18 <b>that you were being deposed?</b></p> <p>19 MR. STARR: Asked and answered.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I don't remember speaking with Jennifer</p> <p>22 Blagg.</p> <p>23 BY MS. WEST:</p> <p>24 <b>Q. Other than having a conversation with</b></p>	<p style="text-align: right;">Page 152</p> <p>1 <b>innocence?</b></p> <p>2 A. I did -- I'm unaware of what position</p> <p>3 the State's Attorney's Office may or may not</p> <p>4 have taken.</p> <p>5 MS. WEST: Okay. I am done with the</p> <p>6 exception of the grand jury issue. And I would</p> <p>7 have two documents to show her. It would be the</p> <p>8 grand jury testimony for Friend. It would be</p> <p>9 the grand jury testimony for Rogers. If we</p> <p>10 could go off the record, I will check my e-mail</p> <p>11 to see if I got anything from my paralegal</p> <p>12 really quick.</p> <p>13 (Whereupon, a discussion was had</p> <p>14 off the record.)</p> <p>15 MS. WEST: Everyone, I mean, I told this to</p> <p>16 John earlier. I don't know who all was on</p> <p>17 there.</p> <p>18 What I would like to do given the fact</p> <p>19 that we -- I understand your position and the</p> <p>20 fact that Ms. Walker doesn't feel comfortable</p> <p>21 testifying about specific grand jury materials</p> <p>22 without reviewing an order from the criminal</p> <p>23 court granting release of those records. What I</p> <p>24 would like to do -- I know you guys are aware</p>

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Page 153	<p>1 they have been produced in discovery. I would</p> <p>2 still like to make a record and go through and</p> <p>3 show her the two specific exhibits I would like</p> <p>4 to use relative to the grand jury.</p> <p>5 And -- and, John, I understand that you</p> <p>6 need to make your record as well as I do, and</p> <p>7 this may be one of those situations where,</p> <p>8 Ms. Walker, it's a little painful in the sense</p> <p>9 that you are going to be instructed not to</p> <p>10 answer, but I'm going to keep asking you a few</p> <p>11 questions. Okay?</p> <p>12 John, anything you want to add?</p> <p>13 MR. COYNE: Just if there is any questions</p> <p>14 about the grand jury transcripts, then the</p> <p>15 witness will be instructed in the same manner as</p> <p>16 she was instructed earlier, which you have</p> <p>17 acknowledged, Allyson, which is that absent an</p> <p>18 order, the appropriate order releasing the grand</p> <p>19 jury transcripts from the Secrecy Act, she would</p> <p>20 be instructed not to answer that question.</p> <p>21 So if we could just enter a stipulation</p> <p>22 rather than inconveniencing the witness</p> <p>23 that's -- that's what I would propose, but that</p> <p>24 would just be a stipulation. It's obviously</p>	Page 155	<p>1 <b>testimony of Terry Rogers in preparation for the</b></p> <p>2 <b>deposition today, correct?</b></p> <p>3 A. I -- I read this exhibit.</p> <p>4 <b>Q. Okay. All right. All right.</b></p> <p>5 <b>Ms. Walker, in your review of</b></p> <p>6 <b>Mr. Roger's grand jury testimony, did you see</b></p> <p>7 <b>that Mr. Rogers positively identified</b></p> <p>8 <b>Mr. Fletcher as the offender involved in the</b></p> <p>9 <b>December 21st, 1990 shooting of Willie Sorrell?</b></p> <p>10 A. I --</p> <p>11 MR. COYNE: Objection -- objection.</p> <p>12 Jennifer, and I'm going to instruct you as</p> <p>13 previously mentioned -- I thought we were going</p> <p>14 to get a stipulation on this -- any questions</p> <p>15 regarding witnesses, evidence, testimony in</p> <p>16 front of the grand jury, my instruction is to</p> <p>17 you, you ought not to answer those questions in</p> <p>18 light of the admonition of the Grand Jury</p> <p>19 Secrecy Act so that you do not face jeopardy for</p> <p>20 violating that Act.</p> <p>21 And that would be my similar</p> <p>22 instruction to you regarding any questions</p> <p>23 pertaining to witnesses, evidence, testimony, or</p> <p>24 other matters pertaining to any grand jury</p>
Page 154	<p>1 your call.</p> <p>2 MS. WEST: Let's do it this way. What I</p> <p>3 would prefer to do is at least mark the</p> <p>4 exhibits, and then I will ask her generally if</p> <p>5 she could -- will provide testimony relative to</p> <p>6 Exhibit X and Exhibit Y, and then you can</p> <p>7 instruct her not to answer, and we don't have to</p> <p>8 go through the process of me asking each</p> <p>9 question.</p> <p>10 Is that fair?</p> <p>11 MR. COYNE: However you want to proceed is</p> <p>12 fine.</p> <p>13 MS. WEST: Thank you. Okay.</p> <p>14 Ms. Court Reporter, what exhibit are we</p> <p>15 on?</p> <p>16 THE COURT REPORTER: 8. And you did mark one</p> <p>17 previously as Exhibit 6, I believe -- or 5.</p> <p>18 MS. WEST: You're right. 5. Let's go there</p> <p>19 first. Exhibit 5, for the record, is the grand</p> <p>20 jury testimony of Terry Rogers taken on May 9th,</p> <p>21 2002. It's Fletcher 7762 through Fletcher 7767.</p> <p>22 BY MS. WEST:</p> <p>23 <b>Q. Ms. Walker, I think we got so far as</b></p> <p>24 <b>the fact that you did review the grand jury</b></p>	Page 156	<p>1 proceeding absent a properly issued order from</p> <p>2 Judge Reddick or other appropriate presiding</p> <p>3 judge at the criminal court that these documents</p> <p>4 and the grand jury testimony in this case has</p> <p>5 been released from the application of the Grand</p> <p>6 Jury Secrecy Act.</p> <p>7 Do you understand my instruction?</p> <p>8 THE WITNESS: I do. Thank you.</p> <p>9 MR. HOLMES: Same -- same guidance and</p> <p>10 instruction on behalf of the State's Attorney's</p> <p>11 Office.</p> <p>12 BY MS. WEST:</p> <p>13 <b>Q. Ms. Walker, based on the instruction</b></p> <p>14 <b>from your attorney, as well as Mr. Holmes, can</b></p> <p>15 <b>you answer my question?</b></p> <p>16 A. I cannot.</p> <p>17 MS. WEST: All right. Let's mark Friend's</p> <p>18 grand jury testimony as Exhibit 8.</p> <p>19 (Whereupon, Walker Deposition</p> <p>20 Exhibit No. 8 was marked for</p> <p>21 identification.)</p> <p>22 BY MS. WEST:</p> <p>23 <b>Q. Ms. Walker, did you have -- oh, I'm</b></p> <p>24 <b>sorry. For the record, the exhibit is</b></p>

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Page 157	<p>1 <b>Ms. Friend's testimony before the grand jury on</b></p> <p>2 <b>May 1st, 2002, which is Bates 474 -- Fletcher</b></p> <p>3 <b>474 through 489.</b></p> <p>4 MR. COYNE: And, Allyson, this is 8 or 9?</p> <p>5 MS. WEST: 8.</p> <p>6 BY MS. WEST:</p> <p>7 <b>Q. Ms. Walker, did you have an opportunity</b></p> <p>8 <b>to review Ms. Friend's grand jury testimony</b></p> <p>9 <b>prior to the deposition today?</b></p> <p>10 A. I did have the opportunity to review</p> <p>11 Exhibit No. 8.</p> <p>12 <b>Q. And based on your review of</b></p> <p>13 <b>Ms. Friend's testimony, does it appear that</b></p> <p>14 <b>Ms. Friend identified Mr. Fletcher as one of the</b></p> <p>15 <b>offenders involved in the shooting of Willie</b></p> <p>16 <b>Sorrell on 19- -- I'm sorry -- on December 21st,</b></p> <p>17 <b>1990?</b></p> <p>18 MR. COYNE: Objection. And same instruction</p> <p>19 to you as previously given as to the prior</p> <p>20 exhibit, Jennifer. If you need me to repeat it,</p> <p>21 I will.</p> <p>22 MR. HOLMES: Join.</p> <p>23 THE WITNESS: I'm good, guys. Thanks.</p> <p>24 BY THE WITNESS:</p>	Page 159	<p>1 object to any reproduction of the witness for</p> <p>2 deposition. Thanks. That's it.</p> <p>3 MR. BURNS: I have no questions.</p> <p>4 MR. STARR: Can we go off the record for just</p> <p>5 two minutes? I just need two minutes.</p> <p>6 MR. COYNE: Sure.</p> <p>7 MR. STARR: Thanks.</p> <p>8 (Whereupon, a short break was</p> <p>9 taken.)</p> <p>10 EXAMINATION</p> <p>11 BY MR. STARR:</p> <p>12 <b>Q. Good afternoon, Ms. Walker. My name is</b></p> <p>13 <b>Sean Starr, and I represent the Plaintiff,</b></p> <p>14 <b>Mr. Fletcher, in this matter. I'm going to be</b></p> <p>15 <b>jumping around here a little bit, but I will do</b></p> <p>16 <b>my best to get us through the day and get you</b></p> <p>17 <b>out of here as efficiently as possible.</b></p> <p>18 <b>I just want to talk a little bit -- ask</b></p> <p>19 <b>you a few questions about your general practice</b></p> <p>20 <b>as a Felony Review State's Attorney.</b></p> <p>21 <b>You said it was from -- you were in</b></p> <p>22 <b>Felony Review from 2001 to 2003; is that</b></p> <p>23 <b>correct?</b></p> <p>24 A. The -- towards the end of '01 to kind</p>
Page 158	<p>1 A. Based on the Grand Jury Secrecy Act and</p> <p>2 the fact that there has been no order presented</p> <p>3 showing that this has been released, I do not --</p> <p>4 am not able to answer that question.</p> <p>5 MS. WEST: Thank you.</p> <p>6 Ms. Walker, those are all the questions</p> <p>7 that I have for you. I am just going to put on</p> <p>8 the record -- and John, I know you need to put a</p> <p>9 response on that I am going to reserve the right</p> <p>10 to redepose Ms. Walker based on those two</p> <p>11 exhibits we marked as Exhibit 6 [sic] and</p> <p>12 Exhibit 8.</p> <p>13 And, John, I know you object, so if you</p> <p>14 would like to put your objection on the record.</p> <p>15 MR. COYNE: Yeah. And on behalf of the</p> <p>16 witness, we object to any continued -- or</p> <p>17 reproduction of this witness for a continued</p> <p>18 deposition. Any predicate for answering these</p> <p>19 questions, i.e. disclosure of the requisite</p> <p>20 order to ask those questions of the witness</p> <p>21 without putting the witness in jeopardy, ought</p> <p>22 to have been, number one, possessed and, number</p> <p>23 two, disclosed to all necessary parties.</p> <p>24 Since that was not done, we would</p>	Page 160	<p>1 of the early -- late summer, early fall of '03.</p> <p>2 <b>Q. Okay. And I wanted to just ask you</b></p> <p>3 <b>about what your general practice is, and if your</b></p> <p>4 <b>answer is -- at any point departs from your</b></p> <p>5 <b>general practices, you know, if you could</b></p> <p>6 <b>indicate that for me. I don't think that's</b></p> <p>7 <b>going to be the case, but please indicate that,</b></p> <p>8 <b>if your -- if your answer was in departure from</b></p> <p>9 <b>what you would normally do during your tenure as</b></p> <p>10 <b>a Felony Review State's Attorney.</b></p> <p>11 <b>Ms. West asked you about what you would</b></p> <p>12 <b>normally do when you first were assigned a case</b></p> <p>13 <b>in Felony Review.</b></p> <p>14 <b>Do you remember that question --</b></p> <p>15 A. Yes.</p> <p>16 <b>Q. -- in the morning?</b></p> <p>17 <b>Okay. I think you mentioned you would</b></p> <p>18 <b>read -- you would read any police reports</b></p> <p>19 <b>that -- that you could get your hands on; is</b></p> <p>20 <b>that correct?</b></p> <p>21 A. Correct.</p> <p>22 <b>Q. Would you specifically ask the police</b></p> <p>23 <b>that were investigating the underlying crime if</b></p> <p>24 <b>there were any police reports?</b></p>



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<p style="text-align: right;">Page 161</p> <p>1 A. Generally, they would give me the</p> <p>2 reports that they had. I didn't have to ask.</p> <p>3 <b>Q. All right. Do you ever -- did you ever</b></p> <p>4 <b>have a circumstance where you were assigned a</b></p> <p>5 <b>case, and you were not given any police reports</b></p> <p>6 <b>by the police investigating the crime, and you</b></p> <p>7 <b>asked for the reports or asked if there were</b></p> <p>8 <b>reports?</b></p> <p>9 MR. COYNE: Objection, foundation. Go ahead.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't have a specific recollection of</p> <p>12 that.</p> <p>13 BY MR. STARR:</p> <p>14 <b>Q. Okay. Would you make an effort to</b></p> <p>15 <b>determine what police reports exist at the time</b></p> <p>16 <b>you're assigned?</b></p> <p>17 A. If it was -- for your questions, I'm</p> <p>18 assuming that the -- the case or the</p> <p>19 investigation would be, you know, a personal</p> <p>20 case, and I was at the police station doing</p> <p>21 this.</p> <p>22 On a phone case, we wouldn't worry</p> <p>23 about -- like, we wouldn't have access to the</p> <p>24 police reports, because we weren't physically</p>	<p style="text-align: right;">Page 163</p> <p>1 MR. BURNS: Objection, foundation.</p> <p>2 BY THE WITNESS:</p> <p>3 A. Typically, in my experience the GPR</p> <p>4 is -- report is where the detective or the</p> <p>5 officer is making notes. They are typically</p> <p>6 handwritten -- when I was on Felony Review, they</p> <p>7 were typically handwritten. It was -- those</p> <p>8 reports tended to be a little less formal and a</p> <p>9 little more note-ish than a sup -- than a</p> <p>10 typewritten sup report that was in, you know,</p> <p>11 complete sentences.</p> <p>12 BY MR. STARR:</p> <p>13 <b>Q. And when you were initially assigned to</b></p> <p>14 <b>a case and you were given police reports by the</b></p> <p>15 <b>detective investigating the case, would you also</b></p> <p>16 <b>receive GPRs on occasion?</b></p> <p>17 MR. COYNE: Objection, foundation. Just to</p> <p>18 spare my objections, these are all general</p> <p>19 progress questions -- general practice questions</p> <p>20 unless indicated otherwise?</p> <p>21 MR. STARR: Yes.</p> <p>22 MR. COYNE: Okay. That's -- I will keep</p> <p>23 still then. Thanks.</p> <p>24 BY THE WITNESS:</p>
<p style="text-align: right;">Page 162</p> <p>1 there. And typically, we would not get the</p> <p>2 police reports for a phone case. But for the --</p> <p>3 for an in-person case, I was typically given the</p> <p>4 police reports. I would ask -- I may ask if</p> <p>5 there were any others, but typically, I was just</p> <p>6 given reports to read.</p> <p>7 <b>Q. Okay. And I am -- I am going -- my</b></p> <p>8 <b>question do -- strike that.</b></p> <p>9 <b>My questions are going to be just about</b></p> <p>10 <b>personal cases where you are present --</b></p> <p>11 A. Okay.</p> <p>12 <b>Q. -- at an area or a station, not about</b></p> <p>13 <b>phone cases. Okay?</b></p> <p>14 A. Okay.</p> <p>15 <b>Q. Excellent.</b></p> <p>16 <b>Are you familiar with a Chicago Police</b></p> <p>17 <b>Department report called the General Progress</b></p> <p>18 <b>Report?</b></p> <p>19 MR. BURNS: Objection, foundation.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Yes. I have seen GPR reports.</p> <p>22 BY MR. STARR:</p> <p>23 <b>Q. What's your understanding of what a</b></p> <p>24 <b>GPR -- the purpose of what a GPR is?</b></p>	<p style="text-align: right;">Page 164</p> <p>1 A. I would -- I believe I would receive</p> <p>2 them sometimes, but not necessarily every time.</p> <p>3 It just depended.</p> <p>4 BY MR. STARR:</p> <p>5 <b>Q. Would you ever as a matter of general</b></p> <p>6 <b>practice ask the detectives if there were any</b></p> <p>7 <b>general progress reports if you did not receive</b></p> <p>8 <b>them at the initial time when you got the rest</b></p> <p>9 <b>of the reports?</b></p> <p>10 A. I don't specifically recall asking for</p> <p>11 them.</p> <p>12 <b>Q. Okay. Would you ever receive any</b></p> <p>13 <b>police -- any notes taken by police in any other</b></p> <p>14 <b>format than a General Progress Report?</b></p> <p>15 A. I don't remember that.</p> <p>16 <b>Q. In addition to police reports, would</b></p> <p>17 <b>you ask the police if they had interviewed the</b></p> <p>18 <b>suspects or witnesses in any given crime?</b></p> <p>19 A. It was my practice to ask if there were</p> <p>20 witnesses and if the witnesses had been spoken</p> <p>21 to by the police.</p> <p>22 <b>Q. Was it also your practice to ask if the</b></p> <p>23 <b>witnesses had, in fact, been spoken to by police</b></p> <p>24 <b>what they had told the police?</b></p>

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Page 165	<p>1 A. Yes. That information was typically</p> <p>2 shared with me.</p> <p>3 <b>Q. All right. And if it wasn't shared</b></p> <p>4 <b>with you, would you seek it out?</b></p> <p>5 A. Typically, I would ask, yes.</p> <p>6 <b>Q. Is it correct to characterize that as a</b></p> <p>7 <b>Felony Review, you would want to know as much as</b></p> <p>8 <b>possible in terms of what the police had learned</b></p> <p>9 <b>prior to your assignment?</b></p> <p>10 A. Well, we didn't typically learn</p> <p>11 anything prior to being assigned, but once we</p> <p>12 were assigned, it was our goal to gather</p> <p>13 information.</p> <p>14 <b>Q. Okay. And maybe I poorly phrased that</b></p> <p>15 <b>question.</b></p> <p>16 <b>But is it correct to characterize your</b></p> <p>17 <b>general practice as a Felony Review State's</b></p> <p>18 <b>Attorney that when you were assigned a case, you</b></p> <p>19 <b>would attempt to learn as much about the</b></p> <p>20 <b>investigation that had occurred prior to your</b></p> <p>21 <b>assignment once you were assigned?</b></p> <p>22 A. Yes.</p> <p>23 <b>Q. Okay. Under what circumstances as a</b></p> <p>24 <b>Cook County State's Attorney - Felony Review</b></p>
Page 166	<p>1 <b>State's Attorney would you interview witnesses</b></p> <p>2 <b>independent of the police?</b></p> <p>3 MR. COYNE: Objection, foundation.</p> <p>4 BY THE WITNESS:</p> <p>5 A. Well, I would -- I would speak to them</p> <p>6 when -- without the police present to find out</p> <p>7 how they had been treated by the police, but I</p> <p>8 would -- but I would never speak to a witness by</p> <p>9 myself -- like completely by myself. There</p> <p>10 would just be a period in talking to them where</p> <p>11 I would speak to them alone -- you know, alone</p> <p>12 without the police there.</p> <p>13 BY MR. STARR:</p> <p>14 <b>Q. Okay. Is it your testimony that you</b></p> <p>15 <b>would never independently interview a witness or</b></p> <p>16 <b>a suspect about an underlying crime separate and</b></p> <p>17 <b>apart from the police with the exception of</b></p> <p>18 <b>asking them about how the police treated them?</b></p> <p>19 MR. COYNE: Objection; form, foundation.</p> <p>20 Mischaracterizes testimony.</p> <p>21 Go ahead.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I can't ever recall an incident where I</p> <p>24 spoke to a witness or a defendant on something I</p>
Page 167	<p>1 was working on with Felony Review without police</p> <p>2 officers there for any part of that</p> <p>3 conversation.</p> <p>4 BY MR. STARR:</p> <p>5 <b>Q. And was there a reason why you would</b></p> <p>6 <b>refrain from doing that?</b></p> <p>7 MR. COYNE: Objection. Jennifer, I'm</p> <p>8 instructing you on the work-product privilege.</p> <p>9 Once again, if in order to answer that question</p> <p>10 you would need to divulge your mental</p> <p>11 impressions -- which include your opinions about</p> <p>12 the evidence, your strategies, your</p> <p>13 decision-making as a prosecutor -- if in order</p> <p>14 to answer counsel's question you would need to</p> <p>15 disclose those mental impressions with respect</p> <p>16 to a specific case, then I would instruct you</p> <p>17 not to answer the question. If you can answer</p> <p>18 the question without doing so, then you may</p> <p>19 proceed and answer.</p> <p>20 MR. HOLMES: Same guidance and same</p> <p>21 instruction on behalf of the State's Attorney's</p> <p>22 Office on the ground of deliberate process</p> <p>23 privilege.</p> <p>24 BY THE WITNESS:</p>
Page 168	<p>1 A. Thank you.</p> <p>2 Could you repeat the question, please?</p> <p>3 BY MR. STARR:</p> <p>4 <b>Q. Yeah.</b></p> <p>5 <b>Was there a reason why as a Cook County</b></p> <p>6 <b>State's Attorney you would refrain from</b></p> <p>7 <b>interviewing witnesses or suspects outside the</b></p> <p>8 <b>presence of police personnel with the -- the one</b></p> <p>9 <b>exception being the one you described, where you</b></p> <p>10 <b>would ask them how they were treated by the</b></p> <p>11 <b>please?</b></p> <p>12 MR. COYNE: Same instruction.</p> <p>13 MR. HOLMES: Same guidance and instruction.</p> <p>14 BY THE WITNESS:</p> <p>15 A. There is -- there is a -- there's a</p> <p>16 couple reasons. One reason when it comes to</p> <p>17 interviewing the defendant is -- is safety.</p> <p>18 One -- there are -- it is -- talking with</p> <p>19 witnesses and defendants -- or potential</p> <p>20 defendants, also, it's good to have another</p> <p>21 person there to help listen and -- and ask the</p> <p>22 questions. You know, when you're talking and</p> <p>23 listening, that can get -- that can -- that can</p> <p>24 be a lot.</p>

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Page 169	<p>1 So it's good to have some- -- someone</p> <p>2 else there as well. And there is probably some</p> <p>3 more reasons. I just can't think of them all</p> <p>4 right now.</p> <p>5 BY MR. STARR:</p> <p>6 <b>Q. Okay. Did you ever have, in your time</b></p> <p>7 <b>as a Felony Review State's Attorney, an occasion</b></p> <p>8 <b>to interview a witness where there was also a</b></p> <p>9 <b>defense counsel present for that interview?</b></p> <p>10 A. I can't remember that. I don't recall</p> <p>11 that situation. I don't -- I just -- I don't</p> <p>12 remember that.</p> <p>13 <b>Q. Do you -- based on your experience, is</b></p> <p>14 <b>that something that would be allowed under the</b></p> <p>15 <b>policies and practices of the State's Attorney</b></p> <p>16 <b>Office as you understood them?</b></p> <p>17 MR. COYNE: Objection; form, foundation.</p> <p>18 Requires speculation.</p> <p>19 MR. HOLMES: Also, I object on grounds of</p> <p>20 work product. And if you would require the</p> <p>21 witness to disclose the work product of the</p> <p>22 State's Attorney's Office in responding to the</p> <p>23 question, I would instruct the witness not to</p> <p>24 answer.</p>	Page 171
Page 170	<p>1 MR. COYNE: Jennifer, just to clarify that as</p> <p>2 far as work product, these -- as counsel</p> <p>3 indicated earlier, these are general practice</p> <p>4 questions. Work product is case specific. So</p> <p>5 if you would need to divulge any mental</p> <p>6 impressions or -- with respect to your work as a</p> <p>7 prosecutor pertaining to a specific case, then I</p> <p>8 would instruct you not to answer.</p> <p>9 In general, you can answer questions</p> <p>10 for work product, as long as it's not pertaining</p> <p>11 a particular case.</p> <p>12 Do you understand?</p> <p>13 BY THE WITNESS:</p> <p>14 A. I do. Thank you.</p> <p>15 Could you repeat the question, please?</p> <p>16 BY MR. STARR:</p> <p>17 <b>Q. Yeah. And I am going to rephrase it</b></p> <p>18 <b>slightly maybe to avoid some of these</b></p> <p>19 <b>objections.</b></p> <p>20 <b>Were you aware of any prohibitions as a</b></p> <p>21 <b>State's Attorney from interviewing witnesses in</b></p> <p>22 <b>the presence of the defense counsel?</b></p> <p>23 MR. COYNE: Objection; form, foundation.</p> <p>24 Go ahead.</p>	Page 172

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Page 173	<p>1 MR. HOLMES: Same objection.</p> <p>2 MR. COYNE: Same objections.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I'm sorry. I'm just having trouble</p> <p>5 understanding. Make promises... um...</p> <p>6 MR. COYNE: Jennifer, you are permitted to</p> <p>7 answer that you don't understand the question,</p> <p>8 if that's the case.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I'm really not understanding the --</p> <p>11 BY MR. STARR:</p> <p>12 <b>Q. Okay.</b></p> <p>13 A. -- when you say "promises," what that</p> <p>14 means.</p> <p>15 <b>Q. Okay. As a Cook County State's</b></p> <p>16 <b>Attorney, were you allowed to make promises</b></p> <p>17 <b>regarding use immunity to witnesses in exchange</b></p> <p>18 <b>for their statement?</b></p> <p>19 MR. COYNE: Objection to foundation and</p> <p>20 speculation.</p> <p>21 Go ahead.</p> <p>22 MR. HOLMES: Deliberative process privilege</p> <p>23 objection on behalf of the State's Attorney's</p> <p>24 Office.</p>	Page 175	<p>1 MR. COYNE: Same objections.</p> <p>2 BY MR. STARR:</p> <p>3 <b>Q. Are you allowed to make a promise about</b></p> <p>4 <b>monetary payment in exchange for a statement</b></p> <p>5 <b>from a witness?</b></p> <p>6 MR. COYNE: Same objections.</p> <p>7 BY THE WITNESS:</p> <p>8 A. If you're talking about a quid pro quo</p> <p>9 payment -- I know that there have been witnesses</p> <p>10 who have received relocation assistance by the</p> <p>11 State's Attorney's Office. I don't have a</p> <p>12 specific recollection of being a part of that</p> <p>13 kind of situation where -- where I have been a</p> <p>14 part of relocation. I know there has been -- I</p> <p>15 have heard conversation about it, but I don't</p> <p>16 know that I have ever sought relocation for a</p> <p>17 witness. Other than that, I don't -- I don't</p> <p>18 know what you're talking about with payment.</p> <p>19 BY MR. STARR:</p> <p>20 <b>Q. Or do you know whether or not as a Cook</b></p> <p>21 <b>County State's Attorney you were allowed to make</b></p> <p>22 <b>promises regarding criminal charges -- pending</b></p> <p>23 <b>criminal charges of a witness in exchange for</b></p> <p>24 <b>their statement in an unrelated case?</b></p>
Page 174	<p>1 BY THE WITNESS:</p> <p>2 A. Generally speaking, I know that use</p> <p>3 immunity is something -- and -- that I as a</p> <p>4 Felony Review assistant would not have been able</p> <p>5 to do -- to make. That's something that happens</p> <p>6 at a level far above mine.</p> <p>7 BY MR. STARR:</p> <p>8 <b>Q. What about can you make a promise</b></p> <p>9 <b>regarding payment to a witness in exchange for</b></p> <p>10 <b>their statement?</b></p> <p>11 MR. COYNE: Objection; form, foundation.</p> <p>12 Incomplete hypothetical. Requires the witness</p> <p>13 to speculate.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I am -- I'm not sure exactly what kind</p> <p>16 of payment you would be talking about. That's</p> <p>17 difficult to answer based off of -- of</p> <p>18 speculation. There are -- you know, I am aware</p> <p>19 of my ethical obligations as a prosecutor, and I</p> <p>20 would act within those -- within those</p> <p>21 obligations. I -- I'm not sure what you mean by</p> <p>22 "payment."</p> <p>23 BY MR. STARR:</p> <p>24 <b>Q. I mean payment, monetary payment.</b></p>	Page 176	<p>1 MR. COYNE: Objection; form, foundation.</p> <p>2 Incomplete hypothetical. Requires the witness</p> <p>3 to speculate.</p> <p>4 Go ahead.</p> <p>5 MR. HOLMES: Object on grounds of deliberate</p> <p>6 process as to the State's Attorney's Office.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Are you talking about when I was on</p> <p>9 Felony Review or throughout my entire experience</p> <p>10 in the office?</p> <p>11 BY MR. STARR:</p> <p>12 <b>Q. I am talking about when you were on</b></p> <p>13 <b>Felony Review.</b></p> <p>14 A. I cannot recall a time where I would</p> <p>15 make -- where I made a promise to a witness</p> <p>16 about criminal charges. I -- your question is</p> <p>17 very broad, and -- and I think it would require</p> <p>18 me to speculate. And, you know, again, I'm</p> <p>19 mindful of my obligations as a prosecutor, and I</p> <p>20 would -- and I seek to comply with my ethical</p> <p>21 obligations.</p> <p>22 <b>Q. Well, I'm just asking whether or not --</b></p> <p>23 <b>I'm going to rephrase it and hopefully this will</b></p> <p>24 <b>help.</b></p>

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<p style="text-align: right;">Page 177</p> <p>1           <b>Do you know, were there any</b>  2           <b>prohibitions in place in the Cook County State's</b>  3           <b>Attorney's Office preventing you from promising</b>  4           <b>a reduced charge in a pending criminal case for</b>  5           <b>a witness in exchange for their statement in an</b>  6           <b>unrelated investigation?</b>  7           MR. COYNE: Objection; form, foundation.  8           Incomplete hypothetical. It requires  9           speculation.  10          Go ahead.  11          BY THE WITNESS:  12          A. Again, I -- could you ask that question  13          one more time, please?  14          MR. STARR: Could we just have it read back?  15                  (Whereupon, the record was read  16                  as requested.)  17          BY THE WITNESS:  18          A. So I can't remember that  19          conversation -- a conversation about -- I was on  20          Felony Review once. It was 22 years ago. I  21          can't -- there is things about being on Felony  22          Review I cannot remember.  23          That being said, I am mindful of my  24          obligations as a prosecutor, and I -- I work</p>	<p style="text-align: right;">Page 179</p> <p>1           <b>Q. All right. You throughout this</b>  2           <b>deposition have referred to being mindful of</b>  3           <b>your obligations as a prosecutor.</b>  4           <b>What do you mean by that?</b>  5           A. There is ethical obligations that a --  6           that a prosecutor has. There -- there -- the  7           golden rule of being a prosecutor is to do the  8           right thing. My -- and that -- and that's what  9           I seek to do as a prosecutor is to do the right  10          thing.  11          <b>Q. When you say "the golden rule is to do</b>  12          <b>the right thing," are you familiar with the --</b>  13          <b>the ABA standard of -- regarding prosecutors to</b>  14          <b>seek -- the duty to seek justice and not merely</b>  15          <b>convict?</b>  16          A. Correct.  17          <b>Q. Is that what you're referring to?</b>  18          A. Yes.  19          <b>Q. Okay. Excellent.</b>  20          <b>And so as a Cook County State's</b>  21          <b>Attorney working in the felony -- felony review</b>  22          <b>division or Felony Review unit, amongst the</b>  23          <b>things that you were obligated ethically to do</b>  24          <b>and understand, were you familiar with your</b></p>
<p style="text-align: right;">Page 178</p> <p>1           within those obligations and -- and I -- I don't  2           ever remember doing that. And your question is  3           pretty broad, and it's difficult to answer.  4           MR. COYNE: Just for the record -- the answer  5           appears to be no, just for the record.  6           MR. STARR: I mean, I would take that answer  7           if I got it, Jim. But I don't think I got it.  8           MR. COYNE: All right. Yeah.  9           BY MR. STARR:  10          <b>Q. Do you know in this case whether any</b>  11          <b>promises were made to any of the witnesses</b>  12          <b>regarding either use immunity, payment, monetary</b>  13          <b>payment, or reduction in pending charges in an</b>  14          <b>unrelated criminal matter?</b>  15          A. I am --  16          MR. COYNE: Objection; form, foundation. Go  17          ahead.  18          MS. WEST: Form and foundation.  19          MR. COYNE: Objection; form, foundation.  20          Go ahead.  21          MS. WEST: Join.  22          BY THE WITNESS:  23          A. I'm unaware of any of those things.  24          BY MR. STARR:</p>	<p style="text-align: right;">Page 180</p> <p>1           <b>obligations under Brady v. Maryland?</b>  2           A. Yes.  3           <b>Q. And you are -- are you familiar with</b>  4           <b>the case of Brady v. Maryland, generally</b>  5           <b>speaking?</b>  6           A. Generally speaking, yes.  7           <b>Q. And what is your general understanding</b>  8           <b>of what Brady v. Maryland -- what kind of</b>  9           <b>obligations it imposes upon State prosecutors?</b>  10          A. That there --  11          MR. HOLMES: I'm just going to -- I'm sorry,  12          ASA Walker. I'm just going to object on behalf  13          of the State's Attorney's Office that Ms. Walker  14          is not here today as a 26(a)(2) expert witness.  15          And with that, the witness can answer.  16          BY THE WITNESS:  17          A. Generally speaking, the idea of Brady  18          is that prosecutors have the duty to bring forth  19          any evidence that may negate guilt. It doesn't  20          mean -- if it's -- even if it's evidence that  21          isn't strictly required to be produced under  22          the -- under discovery, you still have an  23          obligation to produce those kinds of materials,  24          even if it's -- it's not -- even if the evidence</p>

48 (Pages 177 to 180)

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Page 181	<p>1 may not be admissible, you still -- for the</p> <p>2 defense to introduce, you still have to provide</p> <p>3 it.</p> <p>4 BY MR. STARR:</p> <p>5 <b>Q. And what -- how does that apply to --</b></p> <p>6 <b>as far as your experience, how did that apply to</b></p> <p>7 <b>a Felony Review State's Attorney?</b></p> <p>8 MR. HOLMES: I'm just going to -- Sean, if I</p> <p>9 could, just a standing objection --</p> <p>10 MR. COYNE: Incomplete hypothetical -- hang</p> <p>11 on. Let me just finish.</p> <p>12 Objection; form, foundation, incomplete</p> <p>13 hypothetical.</p> <p>14 And, Jennifer, to the extent that you</p> <p>15 would need to reveal your decision-making</p> <p>16 processes as to any particular case, I would</p> <p>17 instruct you not to answer the question,</p> <p>18 pursuant to Federal Rule 26 of the work-product</p> <p>19 doctrine. Thank you.</p> <p>20 MR. HOLMES: And just a standing objection,</p> <p>21 Sean, to this line of questions to the extent</p> <p>22 they seek to elicit expert testimony of ASA</p> <p>23 Walker. So it's a 26(a)(2) objection. Also</p> <p>24 objection on deliberative process grounds on</p>	Page 183	<p>1 MR. HOLMES: Deliberate process objection on</p> <p>2 behalf of the Office.</p> <p>3 BY THE WITNESS:</p> <p>4 A. Your question is very broad. One --</p> <p>5 one way that it would apply is that when</p> <p>6 interviewing a witness, you write down -- or</p> <p>7 you -- you don't write down. You record, you</p> <p>8 take, you -- you -- you ex- -- you -- all the</p> <p>9 things the witness says, not just -- not just</p> <p>10 the evidence or the statements that point</p> <p>11 towards the suspect -- the current suspect, but</p> <p>12 all -- everything that the witness says, and</p> <p>13 that that complete information would be tendered</p> <p>14 over to the defense. That would be an example</p> <p>15 of -- of what an ASA on Felony Review should do</p> <p>16 under Brady.</p> <p>17 BY MR. STARR:</p> <p>18 <b>Q. Okay. As a -- strike that.</b></p> <p>19 <b>You understood that Brady requires</b></p> <p>20 <b>State's Attorneys to turn over any exculpatory</b></p> <p>21 <b>evidence that they learn in the course of their</b></p> <p>22 <b>assignment to a case, correct?</b></p> <p>23 A. Correct.</p> <p>24 <b>Q. And you understood that Brady required</b></p>
Page 182	<p>1 behalf of the Office.</p> <p>2 MR. STARR: I'm good with standing</p> <p>3 objections.</p> <p>4 BY THE WITNESS:</p> <p>5 A. Could you ask the question again,</p> <p>6 please?</p> <p>7 BY MR. STARR:</p> <p>8 <b>Q. Sure.</b></p> <p>9 <b>What -- generally speaking, what was</b></p> <p>10 <b>your understanding -- strike that.</b></p> <p>11 <b>You just testified that your</b></p> <p>12 <b>understanding generally about your obligations</b></p> <p>13 <b>as a State prosecutor on Brady were that you had</b></p> <p>14 <b>to disclose any evidence that may -- I think you</b></p> <p>15 <b>said "may negate guilt," correct?</b></p> <p>16 A. Correct.</p> <p>17 <b>Q. And how did that apply to your time as</b></p> <p>18 <b>a Felony Review State's Attorney?</b></p> <p>19 <b>What were your obligations as a Felony</b></p> <p>20 <b>Review State's Attorney under Brady?</b></p> <p>21 MR. COYNE: Same objection. Foundation,</p> <p>22 form, incomplete hypothetical, and same</p> <p>23 instruction as to Rule 26.</p> <p>24 Go ahead.</p>	Page 184	<p>1 <b>State's Attorneys to turn over any evidence that</b></p> <p>2 <b>may impeach State witnesses, correct?</b></p> <p>3 A. Correct.</p> <p>4 <b>Q. And you understood that Brady requires</b></p> <p>5 <b>that prosecutors refrain from or prevent the</b></p> <p>6 <b>destruction of material evidence, correct?</b></p> <p>7 A. Correct.</p> <p>8 <b>Q. Okay. And so as a Felony Review</b></p> <p>9 <b>State's Attorney, if you learned about any</b></p> <p>10 <b>exculpatory evidence in any case that you were</b></p> <p>11 <b>assigned, you would have disclosed that</b></p> <p>12 <b>evidence, correct?</b></p> <p>13 MR. COYNE: Objection; form, foundation,</p> <p>14 incomplete hypothetical.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Could you say the question again,</p> <p>17 please?</p> <p>18 BY MR. STARR:</p> <p>19 <b>Q. Sure.</b></p> <p>20 <b>As a -- during your tenure as a Cook</b></p> <p>21 <b>County State's Attorney, if you were assigned to</b></p> <p>22 <b>a case and you discovered exculpatory evidence,</b></p> <p>23 <b>you would disclose that evidence, correct?</b></p> <p>24 MR. COYNE: Same objections. And same</p>



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Page 185	<p>1 instruction, Jennifer. As long as you're not</p> <p>2 divulging your decision-making and your opinions</p> <p>3 about evidence, you can answer the question.</p> <p>4 BY THE WITNESS:</p> <p>5 A. Thank you.</p> <p>6 You would -- so as a Felony Review</p> <p>7 State's Attorney, I would -- I would, for lack</p> <p>8 of a better word, "capture" that information.</p> <p>9 It would remain in the file. It would not be --</p> <p>10 you know, since I -- I'm not the trial ASA, so I</p> <p>11 wouldn't be actually handing it over to the</p> <p>12 defense, but it would certainly be my obligation</p> <p>13 to -- to capture that evidence.</p> <p>14 BY MR. STARR:</p> <p>15 <b>Q. Would it be your obligation to inform a</b></p> <p>16 <b>supervisor about becoming aware of that</b></p> <p>17 <b>evidence?</b></p> <p>18 MR. COYNE: Objection; form, foundation.</p> <p>19 BY THE WITNESS:</p> <p>20 A. It would depend on -- it would depend.</p> <p>21 BY MR. STARR:</p> <p>22 <b>Q. Okay.</b></p> <p>23 A. I wouldn't necessarily call my</p> <p>24 supervisor for every -- every little thing.</p>	Page 187	<p>1 <b>to, after the end of your time working on that</b></p> <p>2 <b>case, would you still have that obligation to</b></p> <p>3 <b>capture that evidence in some format?</b></p> <p>4 MR. COYNE: Objection; foundation, incomplete</p> <p>5 hypothetical. Requires speculation.</p> <p>6 Go ahead. And form.</p> <p>7 MR. HOLMES: Standing -- standing 26(a)(2)</p> <p>8 objection.</p> <p>9 BY THE WITNESS:</p> <p>10 A. Could you repeat the question, please?</p> <p>11 BY MR. STARR:</p> <p>12 <b>Q. Yeah. Maybe -- maybe I didn't phrase</b></p> <p>13 <b>it that well.</b></p> <p>14 <b>I'm just wondering -- you know, you're</b></p> <p>15 <b>working as a Felony Review ASA on a case.</b></p> <p>16 <b>At some point you hand that case off to</b></p> <p>17 <b>a trial attorney, correct?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Okay. So under that circumstance, if</b></p> <p>20 <b>you had learned about exculpatory evidence after</b></p> <p>21 <b>you had handed off the case to another State's</b></p> <p>22 <b>Attorney, would you still have an obligation to</b></p> <p>23 <b>capture that evidence and to document that in</b></p> <p>24 <b>some way?</b></p>
Page 186	<p>1 Like, it may be -- I'm sorry.</p> <p>2 I have -- something popped up on my</p> <p>3 computer that I need to click to postpone for a</p> <p>4 notific- -- software update. Sorry.</p> <p>5 It's not something I would hide from my</p> <p>6 supervisor, but I may not pick up the phone</p> <p>7 directly after learning it and notify my</p> <p>8 supervisor either.</p> <p>9 <b>Q. Okay. What do you -- how -- strike</b></p> <p>10 <b>that.</b></p> <p>11 <b>What do you mean when you say that you</b></p> <p>12 <b>would capture that exculpatory evidence in the</b></p> <p>13 <b>file? What does that mean?</b></p> <p>14 A. It means it -- it may be written down.</p> <p>15 It may be -- if I know that it's -- it's in a</p> <p>16 police report, it may -- it may be something</p> <p>17 that I'm just mentally aware of that it's in the</p> <p>18 police report. It may not necessarily mean --</p> <p>19 I'm -- I'm not necessarily going to -- I, as a</p> <p>20 Felony Review ASA, would not necessarily write</p> <p>21 my own memo about it. It would just depend.</p> <p>22 There is -- it would depend.</p> <p>23 <b>Q. Okay. And if you became aware of</b></p> <p>24 <b>exculpatory evidence on a case you were assigned</b></p>	Page 188	<p>1 MR. COYNE: Same objection.</p> <p>2 MR. HOLMES: Same 26(a)(2) objection.</p> <p>3 BY THE WITNESS:</p> <p>4 A. If I no longer am working on the file,</p> <p>5 I'm not sure how I would have -- how I would</p> <p>6 learn of that evidence. It would cause --</p> <p>7 it's -- as -- as an ASA, if I learned about a</p> <p>8 case that I was handling with that evidence,</p> <p>9 then yes. If I wasn't handling the case, I may</p> <p>10 not understand that it is exculpatory, because</p> <p>11 the case isn't top of mind. I -- I -- I don't</p> <p>12 understand what you're asking me.</p> <p>13 MR. COYNE: You can lead with that. Yeah.</p> <p>14 By the way, Jennifer, you can lead with "I don't</p> <p>15 understand what you're asking" just to -- just</p> <p>16 to make that suggestion. Let me just make that</p> <p>17 suggestion, if you just lead with "I don't</p> <p>18 understand what you're asking." That's just a</p> <p>19 suggestion I think everyone would appreciate.</p> <p>20 Go ahead.</p> <p>21 BY MR. STARR:</p> <p>22 <b>Q. As a State's Attorney, does your</b></p> <p>23 <b>ethical obligation under Brady stop at some</b></p> <p>24 <b>point?</b></p>



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<p style="text-align: right;">Page 189</p> <p>1 MR. HOLMES: 26(a)(2) objection. 2 MR. COYNE: Yeah. Objection, foundation and 3 form. 4 BY THE WITNESS: 5 A. I believe -- it's my understanding that 6 Brady applies to prosecutors. I will admit I 7 have not read Brady for a bit. I understand the 8 generalities. I'm not -- I don't feel qualified 9 to -- to answer specific questions like that. 10 BY MR. STARR: 11 Q. Well, then let me ask you a different 12 question. 13 During your testimony as a Felony 14 Review ASA, did you adhere to your ethical and 15 legal obligations under Brady? 16 A. Yes. 17 Q. Okay. Are you aware that the Illinois 18 Rules of Professional Conduct have analogues to 19 Brady, correct? 20 A. Yes. 21 Q. And that under Illinois Professional 22 Rule of Conduct 3.8, you have a -- the 23 prosecutor has a special responsibility to make 24 a timely disclosure to the defense of all</p>	<p style="text-align: right;">Page 191</p> <p>1 training included Brady training. 2 Q. Do you recall having training on Brady 3 at some point in your career as a State's 4 Attorney? 5 A. Yes. 6 Q. Okay. And did you learn about Brady in 7 law school? 8 A. That was a really long time ago and I 9 can't -- I don't know. Probably. 10 Q. Did you ever take any continuing 11 education on Brady? 12 A. I may have, but I can't -- I don't 13 remember, because I'm old enough to have been a 14 lawyer before CLE was required. So I 15 don't know. I don't know as -- I can't 16 remember. 17 Q. But as a general proposition you're 18 familiar with Brady, and you believe that you 19 adhered to its principles during your time as a 20 State's Attorney, correct? 21 A. Correct. 22 Q. Are you aware of any instance in which 23 you withheld exculpatory evidence on a case you 24 were assigned to?</p>
<p style="text-align: right;">Page 190</p> <p>1 evidence or information known to the prosecutor 2 that tends to negate the guilt of the accused or 3 mitigates the offense. 4 Do you understand that? 5 A. Yes. 6 Q. Okay. And did you adhere to that 7 principal during your testimony as a Felony 8 Review State's Attorney? 9 A. Yes. 10 Q. Okay. And did you follow these rules, 11 Brady and local rules of Illinois, during your 12 entire time at the State's Attorney's Office? 13 A. I -- I certainly believe so, yes. 14 Q. Okay. And you are aware that -- you 15 know, that not following your Brady obligations 16 can lead to discipline, suspension, disbarment, 17 and other punishments, correct? 18 A. Correct. 19 Q. Okay. Do you recall receiving any 20 training on Brady when you first went into 21 Felony Review? 22 A. It was 22 years ago. I know we 23 received training. I do not specifically 24 remember as I sit here today if it -- if that</p>	<p style="text-align: right;">Page 192</p> <p>1 A. I am -- 2 MR. COYNE: Objection, foundation. Go ahead. 3 BY THE WITNESS: 4 A. I'm not aware of that. 5 BY MR. STARR: 6 Q. Are you aware of any instance where 7 another prosecutor withheld any exculpatory 8 evidence in a case that the Cook County State's 9 Attorney was prosecuting? 10 MR. COYNE: Objection. 11 A. I am not -- I am not aware of that. 12 THE COURT REPORTER: I'm sorry. What was the 13 objection? 14 MR. COYNE: Foundation. 15 BY THE WITNESS: 16 A. And my answer is, I'm not aware of 17 that. 18 BY MR. STARR: 19 Q. Okay. I want to pivot a little bit 20 here and talk about the extent to which a 21 State's Attorney would typically be involved in 22 a law enforcement investigation. And I want to 23 be really clear here. When I say 24 investigations, I'm talking about prosecutors</p>

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Page 193	<p>1 leaving their prosecutory role and acting as</p> <p>2 investigators in a criminal investigation.</p> <p>3 Is it fair to say that in 2002</p> <p>4 prosecutors within the Cook County State's</p> <p>5 Attorney's Office did not typically investigate</p> <p>6 crimes independent of the police agencies that</p> <p>7 brought them cases?</p> <p>8 MR. COYNE: Objection, form and foundation.</p> <p>9 MR. HOLMES: 30(b)(6) and 26(a)(2) objection</p> <p>10 on behalf of the Office, that the witness is</p> <p>11 here as a fact witness and not as a 30(b)(6) or</p> <p>12 expert witness.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Could you repeat the question, please?</p> <p>15 BY MR. STARR:</p> <p>16 Q. Certainly.</p> <p>17 Is it fair to say that in 2002</p> <p>18 prosecutors within the Cook County State's</p> <p>19 Attorney's Office did not typically investigate</p> <p>20 crimes independent of the police agencies that</p> <p>21 brought them cases?</p> <p>22 MR. HOLMES: Same objections.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I would say that is correct.</p>	Page 195	<p>1 Q. And was it your practice as a Cook</p> <p>2 County State's Attorney in the Felony Review</p> <p>3 Unit to rely on the information provided to you</p> <p>4 by police to be complete and accurate?</p> <p>5 MR. COYNE: Same objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes. I -- I believed it was -- it was</p> <p>8 true and accurate or I relied on it to be true</p> <p>9 and accurate, yes.</p> <p>10 BY MR. STARR:</p> <p>11 Q. And did you also, as a Cook County</p> <p>12 State's Attorney, have an expectation that the</p> <p>13 evidence and information that the police</p> <p>14 presented you would be true and accurate?</p> <p>15 MR. COYNE: Objection, form and foundation.</p> <p>16 Requires speculation.</p> <p>17 MS. WEST: Join.</p> <p>18 BY THE WITNESS:</p> <p>19 A. If you're asking if that was the</p> <p>20 standard, yes. I expected the information to be</p> <p>21 true and accurate.</p> <p>22 BY MR. STARR:</p> <p>23 Q. I'm asking -- I'm asking you, was that</p> <p>24 your practice?</p>
Page 194	<p>1 BY MR. STARR:</p> <p>2 Q. And was that your understanding of the</p> <p>3 Cook County State's Attorney's practice, to not</p> <p>4 independently investigate crimes?</p> <p>5 MR. HOLMES: Same objections.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes, that is my under- -- that was my</p> <p>8 understanding.</p> <p>9 BY MR. STARR:</p> <p>10 Q. In your experience, was it fair to say</p> <p>11 that the Cook County State's Attorney's Office</p> <p>12 typically relied on the information that the</p> <p>13 police departments brought them about the cases</p> <p>14 that they were assigned to?</p> <p>15 MR. COYNE: Objection, form and foundation.</p> <p>16 MS. WEST: Join.</p> <p>17 MR. HOLMES: 30(b)(6) and 26(a)(2)</p> <p>18 objections.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I would -- I would say we did rely</p> <p>21 on -- on the -- we relied on information that</p> <p>22 was brought to us by the -- by law enforcement,</p> <p>23 yes.</p> <p>24 BY MR. STARR:</p>	Page 196	<p>1 Did you -- did you expect that the</p> <p>2 information brought to you by the police, that</p> <p>3 that information would be true and accurate?</p> <p>4 MR. COYNE: Objection; form, foundation.</p> <p>5 Incomplete hypothetical.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes. I would expect it to be true and</p> <p>8 accurate.</p> <p>9 BY MR. STARR:</p> <p>10 Q. And you understand that State's</p> <p>11 Attorneys who engage in investigations of crimes</p> <p>12 separate and apart from the police department,</p> <p>13 they are -- they're not absolutely immune from</p> <p>14 civil suits, correct?</p> <p>15 MR. COYNE: Objection, form and foundation.</p> <p>16 Incomplete hypothetical. Requires the witness</p> <p>17 to speculate.</p> <p>18 MR. HOLMES: 26(a)(2) and 30(b)(6) objections</p> <p>19 on behalf of the Office.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I have heard that, but I am not an --</p> <p>22 I'm not an expert on prosecutorial immunity.</p> <p>23 BY MR. STARR:</p> <p>24 Q. Do you know whether or not the Cook</p>

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Page 197	<p>1 <b>County State's Attorney -- strike that.</b></p> <p>2 <b>As a Cook County State's Attorney in</b></p> <p>3 <b>the Felony Review Unit, did you conduct any</b></p> <p>4 <b>independent investigation into the murder of</b></p> <p>5 <b>Willie Sorrell separate and apart from the</b></p> <p>6 <b>Chicago Police Department?</b></p> <p>7 MR. COYNE: Objection to --</p> <p>8 BY THE WITNESS:</p> <p>9 A. I do not recall doing so.</p> <p>10 THE COURT REPORTER: What was the objection?</p> <p>11 MR. COYNE: Form.</p> <p>12 BY MR. STARR:</p> <p>13 <b>Q. And is it your understanding that the</b></p> <p>14 <b>prosecution of James Fletcher was based on</b></p> <p>15 <b>evidence brought to the State's Attorney's</b></p> <p>16 <b>Office by the Chicago Police Department?</b></p> <p>17 MR. COYNE: Objection, foundation.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I don't know what, if anything, changed</p> <p>20 after the Felony Review process ended. My</p> <p>21 involvement -- I don't remember my involvement</p> <p>22 in this case extending past anything that would</p> <p>23 have happened when I was on Felony Review.</p> <p>24 BY MR. STARR:</p>	Page 199	<p>1 A. The -- the Chicago Police Department</p> <p>2 was the investigating agency. They -- yes.</p> <p>3 Yeah. I believe so, yes.</p> <p>4 <b>Q. And how -- strike that.</b></p> <p>5 <b>Can you explain your role in</b></p> <p>6 <b>determining whether or not there was probable</b></p> <p>7 <b>cause to charge James Fletcher in this case?</b></p> <p>8 MR. COYNE: Objection, foundation.</p> <p>9 MR. HOLMES: Object on grounds of</p> <p>10 deliberative process privilege as to the State's</p> <p>11 Attorney's Office.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I don't think I can answer that</p> <p>14 question without getting into my deliberative</p> <p>15 process. I don't think I can answer that.</p> <p>16 BY MR. STARR:</p> <p>17 <b>Q. Okay. Can I -- let me ask you this:</b></p> <p>18 <b>Did you make the determination of whether or not</b></p> <p>19 <b>there was enough probable cause to charge James</b></p> <p>20 <b>Fletcher in this case?</b></p> <p>21 MR. HOLMES: Same objection.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I do not recall if -- if the</p> <p>24 determination to charge was made by me alone or</p>
Page 198	<p>1 <b>Q. All right. The -- as a Cook County</b></p> <p>2 <b>State's Attorney -- Felony Review attorney, you</b></p> <p>3 <b>had to rely on the Chicago police to provide you</b></p> <p>4 <b>facts that amounted to probable cause; is that</b></p> <p>5 <b>correct?</b></p> <p>6 MR. COYNE: Objection; form, foundation.</p> <p>7 MS. WEST: Join.</p> <p>8 BY THE WITNESS:</p> <p>9 A. For what? I'm not sure I understand</p> <p>10 what you're asking me.</p> <p>11 BY MR. STARR:</p> <p>12 <b>Q. Let me rephrase it.</b></p> <p>13 <b>In the Willie Sorrell murder</b></p> <p>14 <b>investigation, you, as a Cook County State's</b></p> <p>15 <b>Attorney in the Felony Review Unit, had to rely</b></p> <p>16 <b>on the Chicago police to provide you facts to</b></p> <p>17 <b>determine probable -- probable cause; is that</b></p> <p>18 <b>correct?</b></p> <p>19 MR. COYNE: Objection. Form and foundation.</p> <p>20 MS. WEST: Join.</p> <p>21 BY THE WITNESS:</p> <p>22 A. Probable cause to charge?</p> <p>23 BY MR. STARR:</p> <p>24 <b>Q. Yes.</b></p>	Page 200	<p>1 if there were others involved. I have no</p> <p>2 independent recollection of that.</p> <p>3 BY MR. STARR:</p> <p>4 <b>Q. Is there any document that you are</b></p> <p>5 <b>aware of that would indicate who made the final</b></p> <p>6 <b>decision on probable cause in the Willie Sorrell</b></p> <p>7 <b>murder investigation?</b></p> <p>8 A. So typically, in Felony -- while I was</p> <p>9 on Felony Review, if I discussed a case with a</p> <p>10 supervisor, I would make a notation on the</p> <p>11 Felony Review file. This case I don't have an</p> <p>12 independent recollection of how -- of how</p> <p>13 that -- that process went. So I can't answer</p> <p>14 how it happened in this case.</p> <p>15 <b>Q. So my question was, is there a document</b></p> <p>16 <b>that would indicate to you who made that</b></p> <p>17 <b>decision?</b></p> <p>18 <b>Is it your testimony that that document</b></p> <p>19 <b>would be the Felony Review folder?</b></p> <p>20 MR. COYNE: Objection; form, foundation.</p> <p>21 BY THE WITNESS:</p> <p>22 A. So because I don't have a specific</p> <p>23 recollection as to this case, I can't tell you</p> <p>24 exact -- I can't tell you, "Oh, this is the</p>

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<p style="text-align: right;">Page 201</p> <p>1 document."</p> <p>2 I can tell you generally that if I</p> <p>3 spoke about a case with a supervisor, that that</p> <p>4 would be noted on the Felony Review file, that I</p> <p>5 had -- that I had at least a conversation, if</p> <p>6 not multiple conversations, with a supervisor.</p> <p>7 BY MR. STARR:</p> <p>8 <b>Q. And we reviewed the Felony Review</b></p> <p>9 <b>folder at length during the course of this</b></p> <p>10 <b>deposition; is that correct?</b></p> <p>11 A. Yes.</p> <p>12 <b>Q. And did you see any indication on the</b></p> <p>13 <b>folder either during the course of the</b></p> <p>14 <b>deposition or in preparation for the deposition</b></p> <p>15 <b>that indicated to you that you consulted with a</b></p> <p>16 <b>supervisor in determining probable cause in this</b></p> <p>17 <b>case?</b></p> <p>18 A. So the Felony Review file does indicate</p> <p>19 that supervisors -- that several of my</p> <p>20 supervisors or people who I know were my</p> <p>21 supervisors at that time were notified. But I</p> <p>22 don't have an independent recollection if they</p> <p>23 were notified or not, because I don't have an</p> <p>24 independent recollection of this case since it</p>	<p style="text-align: right;">Page 203</p> <p>1 <b>Review file as you understand it earlier today</b></p> <p>2 <b>as Exhibit 1, correct?</b></p> <p>3 A. Correct. Well, one thing I do want to</p> <p>4 say, the -- when I was reviewing these documents</p> <p>5 in preparation for my deposition, there was one</p> <p>6 page in that Felony Review file attachment that</p> <p>7 we did not talk about during -- I have not</p> <p>8 talked about during this deposition.</p> <p>9 But it was made out in a handwriting</p> <p>10 that I did not recognize to be mine. I don't</p> <p>11 know who it is. I don't know anything about it.</p> <p>12 But that was part of that exhibit that I looked</p> <p>13 at, and I just want to be clear that I don't</p> <p>14 know anything about that -- that piece of paper,</p> <p>15 because it doesn't look like mine.</p> <p>16 <b>Q. I was --</b></p> <p>17 A. It doesn't look like my handwriting.</p> <p>18 <b>Q. I was planning to ask you some</b></p> <p>19 <b>questions about that then.</b></p> <p>20 A. Okay.</p> <p>21 <b>Q. And we will get to that in short order.</b></p> <p>22 A. Okay.</p> <p>23 <b>Q. Regarding the Felony Review folder, if</b></p> <p>24 <b>a Felony Review State's Attorney had conducted</b></p>
<p style="text-align: right;">Page 202</p> <p>1 was 22 years ago.</p> <p>2 <b>Q. And what supervisors did you see listed</b></p> <p>3 <b>on the Felony Review file?</b></p> <p>4 A. Off the top of my head without looking</p> <p>5 at those documents, I believe I saw Darren</p> <p>6 O'Brien, and I believe I saw Chamberlain. And</p> <p>7 there may have been somebody else, but I don't</p> <p>8 remember.</p> <p>9 <b>Q. Do you know if Darren O'Brien had a</b></p> <p>10 <b>brother that was in the Chicago Police</b></p> <p>11 <b>Department?</b></p> <p>12 A. Are you -- I'm sorry. Are you asking</p> <p>13 or telling?</p> <p>14 <b>Q. I'm asking you if you know.</b></p> <p>15 <b>Do you know if Darren O'Brien has a</b></p> <p>16 <b>brother on the Chicago Police Department?</b></p> <p>17 A. I do not know. I'm unaware of that.</p> <p>18 <b>Q. Okay. Regarding the Felony Review</b></p> <p>19 <b>file, is the Felony Review file and the Felony</b></p> <p>20 <b>Review notes the same document, or are those</b></p> <p>21 <b>separate things?</b></p> <p>22 A. I'm not -- I'm not familiar with the</p> <p>23 concept of Felony Review notes.</p> <p>24 <b>Q. Okay. So we looked at the Felony</b></p>	<p style="text-align: right;">Page 204</p> <p>1 <b>an interview with a defendant, would you expect</b></p> <p>2 <b>there to be some summary of that interview on</b></p> <p>3 <b>the folder?</b></p> <p>4 MR. COYNE: Objection; form, foundation.</p> <p>5 Requires speculation.</p> <p>6 BY THE WITNESS:</p> <p>7 A. And I'm sorry. Just to make sure, you</p> <p>8 said with a defendant, correct?</p> <p>9 BY MR. STARR:</p> <p>10 <b>Q. Yes.</b></p> <p>11 A. Okay. I would -- it would be -- at the</p> <p>12 time it was certainly my practice to write down</p> <p>13 a summary of a -- any conversation I had with</p> <p>14 the defendant in the folder.</p> <p>15 <b>Q. Okay. During your time as a Felony</b></p> <p>16 <b>Review State's Attorney, was it also your</b></p> <p>17 <b>practice to summarize any interview you may have</b></p> <p>18 <b>had with a witness during the pendency of a</b></p> <p>19 <b>case?</b></p> <p>20 A. Not necessarily. It -- it could be</p> <p>21 that -- there may be a few things that were</p> <p>22 notated on the file, but a general summary of</p> <p>23 what the witness said is not -- I would not</p> <p>24 necessarily do a big summary of what they said</p>

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Page 205	<p>1 to me on the file.</p> <p>2 <b>Q. If a witness indicated to you that they</b></p> <p>3 <b>could identify a suspect, is that something that</b></p> <p>4 <b>you would necessarily include in the file?</b></p> <p>5 A. It's some- --</p> <p>6 MR. COYNE: Objection, foundation.</p> <p>7 BY THE WITNESS:</p> <p>8 A. It's something I may include. I</p> <p>9 wouldn't say I would include it every time.</p> <p>10 BY MR. STARR:</p> <p>11 <b>Q. If a witness indicated to you that they</b></p> <p>12 <b>were unable to identify a suspect, is that</b></p> <p>13 <b>something that you would include every time?</b></p> <p>14 MR. COYNE: Same objection.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I would say I would typically include</p> <p>17 it, but I can't promise every time.</p> <p>18 BY MR. STARR:</p> <p>19 <b>Q. Would that be something that would</b></p> <p>20 <b>potentially be exculpatory that you would be</b></p> <p>21 <b>required to document under Brady?</b></p> <p>22 MR. COYNE: Objection; foundation,</p> <p>23 speculation.</p> <p>24 MR. HOLMES: 26(a)(2) objection on behalf of</p>	Page 207	<p>1 time.</p> <p>2 (Whereupon, the record was read</p> <p>3 as requested.)</p> <p>4 MR. COYNE: Same objections.</p> <p>5 MR. HOLMES: Same objection.</p> <p>6 BY THE WITNESS:</p> <p>7 A. If there was no other writing capturing</p> <p>8 that information, that is something I would</p> <p>9 expect I would have -- would have captured -- I</p> <p>10 would have put in the file or directed it to be</p> <p>11 captured elsewhere.</p> <p>12 BY MR. STARR:</p> <p>13 <b>Q. And you would have done so, because you</b></p> <p>14 <b>would be obligated under Brady and other local</b></p> <p>15 <b>rules to document exculpatory evidence, correct?</b></p> <p>16 MR. COYNE: Same objections.</p> <p>17 MR. HOLMES: 26(a)(2) objection.</p> <p>18 BY THE WITNESS:</p> <p>19 A. Yeah. Yes, I believe so.</p> <p>20 BY MR. STARR:</p> <p>21 <b>Q. Okay. At what point -- based on your</b></p> <p>22 <b>understanding, at what point in a police</b></p> <p>23 <b>investigation does Felony Review get assigned to</b></p> <p>24 <b>a case?</b></p>
Page 206	<p>1 the Office.</p> <p>2 BY THE WITNESS:</p> <p>3 A. It could be, but it could also have</p> <p>4 been -- I could also have seen if it was a</p> <p>5 police report, and so if it was already in a</p> <p>6 police report, it may not be something that I</p> <p>7 would also include.</p> <p>8 BY MR. STARR:</p> <p>9 <b>Q. That's fair.</b></p> <p>10 <b>So in a circumstance where you're not</b></p> <p>11 <b>aware that there is any other documentation</b></p> <p>12 <b>regarding a witness stating that they could not</b></p> <p>13 <b>make an identification and you learn that fact</b></p> <p>14 <b>from a witness, is that something that you would</b></p> <p>15 <b>be obligated to document -- and in using your</b></p> <p>16 <b>own terminology -- "capture" in the file?</b></p> <p>17 MR. COYNE: Objection, form and foundation.</p> <p>18 Requires speculation. Incomplete hypothetical.</p> <p>19 MR. HOLMES: 26(a)(2) objection.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I'm sorry. I need that -- I need you</p> <p>22 to ask that again.</p> <p>23 MR. STARR: Let's have it read back, because</p> <p>24 I don't know if I can get it as well as last</p>	Page 208	<p>1 MR. COYNE: Objection, foundation.</p> <p>2 Incomplete hypothetical.</p> <p>3 BY THE WITNESS:</p> <p>4 A. So back in -- when I was on Review in</p> <p>5 2001, we typically did not go out -- go out to a</p> <p>6 police station unless there was a witness to</p> <p>7 talk to. It -- but it would depend on -- on the</p> <p>8 case. Typically, there was a witness to talk to</p> <p>9 at least.</p> <p>10 BY MR. STARR:</p> <p>11 <b>Q. Okay. In your general experience in</b></p> <p>12 <b>Felony Review, if you were called out to talk to</b></p> <p>13 <b>a witness, and that witness -- once you engaged</b></p> <p>14 <b>with that witness, they told you that they could</b></p> <p>15 <b>identify the suspect and that they, you know,</b></p> <p>16 <b>knew the suspect's name, what would be your --</b></p> <p>17 <b>what would be your next steps in your -- in your</b></p> <p>18 <b>process?</b></p> <p>19 MR. COYNE: Objection; form, foundation,</p> <p>20 incomplete hypothetical.</p> <p>21 And I would remind you of the prior</p> <p>22 admonition, Jennifer. If you have to reveal</p> <p>23 your decision-making as to a particular case,</p> <p>24 that would be precluded under Federal Rule 26.</p>

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Page 209	<p>1 If you can answer the question without doing so,</p> <p>2 then go ahead.</p> <p>3 MS. WEST: Objection to form and foundation.</p> <p>4 BY THE WITNESS:</p> <p>5 A. So there is a -- there is lot of --</p> <p>6 there is a lot of factors at play. Like, is</p> <p>7 this witness the first witness that's -- that</p> <p>8 someone from Felony Review has talked to? Is</p> <p>9 this witness the 17th person that the Felony</p> <p>10 Review has talked to? Is there a defendant that</p> <p>11 has been talked to? Is there a video of this</p> <p>12 situation?</p> <p>13 Like, there is an awful lot of</p> <p>14 hypotheticals with all of that. So -- so it</p> <p>15 would really depend. I believe your question is</p> <p>16 what -- after I talk to a witness -- could you</p> <p>17 repeat the question, please?</p> <p>18 BY MR. STARR:</p> <p>19 <b>Q. Yeah. Let me --</b></p> <p>20 A. I want to make sure I'm answering it</p> <p>21 right.</p> <p>22 <b>Q. Maybe I can rephrase it for you to make</b></p> <p>23 <b>it easier.</b></p> <p>24 <b>If you were assigned to a case as</b></p>	Page 211	<p>1 at that time.</p> <p>2 BY MR. STARR:</p> <p>3 <b>Q. And why would you -- why would you</b></p> <p>4 <b>refrain from taking a written statement at that</b></p> <p>5 <b>time?</b></p> <p>6 MR. COYNE: Same objections.</p> <p>7 BY MR. STARR:</p> <p>8 <b>Q. What circumstances might you refrain</b></p> <p>9 <b>from taking a written statement?</b></p> <p>10 MR. COYNE: Sorry. Same objections. Form,</p> <p>11 foundation, incomplete hypothetical.</p> <p>12 MS. WEST: Join.</p> <p>13 MR. COYNE: Also, yeah, I need to take a</p> <p>14 phone call. I hate to interrupt the pending</p> <p>15 question, but this is a call I have to take.</p> <p>16 BY THE WITNESS:</p> <p>17 A. And --</p> <p>18 MR. COYNE: Do you want to answer -- hang on.</p> <p>19 Go ahead.</p> <p>20 Hi. It's John Coyne. Can you hold one</p> <p>21 second, please? Thank you.</p> <p>22 All right. Could you answer, and</p> <p>23 then -- so I can talk a call?</p> <p>24 BY THE WITNESS:</p>
Page 210	<p>1 <b>Felony Review State's Attorney and you went out</b></p> <p>2 <b>and there was a witness at the police station</b></p> <p>3 <b>and the witness told you that they could</b></p> <p>4 <b>identify the suspect and they gave you that</b></p> <p>5 <b>person's name, would you take a statement from</b></p> <p>6 <b>that person?</b></p> <p>7 MR. COYNE: Object; form, foundation,</p> <p>8 incomplete hypothetical.</p> <p>9 MS. WEST: Join.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I may, or I may not.</p> <p>12 BY MR. STARR:</p> <p>13 <b>Q. Under what circumstances would you</b></p> <p>14 <b>refrain from taking a statement?</b></p> <p>15 MR. COYNE: Same objections.</p> <p>16 BY THE WITNESS:</p> <p>17 A. It would -- it would depend on -- so</p> <p>18 when I answered before, I was assuming you</p> <p>19 were -- I -- I assumed myself -- you did not ask</p> <p>20 me this. I assumed that it was a written</p> <p>21 statement.</p> <p>22 So I would like to amend my answer to</p> <p>23 say, I would have a conversation with them, but</p> <p>24 I may not necessarily take a written statement</p>	Page 212	<p>1 A. Yes.</p> <p>2 It would depend on a variety of</p> <p>3 factors, and to answer that question, I think I</p> <p>4 would have to disclose my decision-making</p> <p>5 process and work product.</p> <p>6 MR. COYNE: All right. And, Sean, just so</p> <p>7 you know, we've been going for over five hours</p> <p>8 with a couple of short breaks. If this is still</p> <p>9 going at 4:15, I'm going to need about a</p> <p>10 45-minute break to address the matters that have</p> <p>11 developed today. I mean, you can go as long as</p> <p>12 you want, but I'm going to need about 45 minutes</p> <p>13 if we're still going at 4:15. I'll try to make</p> <p>14 it 30, but it could be 45.</p> <p>15 MR. STARR: I don't know if -- I mean, I -- I</p> <p>16 have some obligations myself, John, after normal</p> <p>17 work hours. I don't know if I can stick around</p> <p>18 past 5:00. I'm -- I'm trying to get through</p> <p>19 this as quickly as possible.</p> <p>20 MR. COYNE: Yeah. I'm not complaining. I'm</p> <p>21 just saying --</p> <p>22 MR. STARR: Are we on the record?</p> <p>23 MR. COYNE: Hang on. Hang on. We have been</p> <p>24 going over five hours with very short breaks.</p>

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Page 213	<p>1 I'm just telling you -- you can go</p> <p>2 until 7:00 if you want. I'm just saying, if</p> <p>3 it's still going at 4:15, I'm going to need 30</p> <p>4 to 45 minutes. I'm -- we can -- then, we can</p> <p>5 resume.</p> <p>6 MR. HOLMES: We only took a 20-minute lunch</p> <p>7 break. So Mr. Coyne's request is not</p> <p>8 unreasonable.</p> <p>9 MR. COYNE: Right. I -- yeah. And it wasn't</p> <p>10 a lunch break for me.</p> <p>11 MR. HOLMES: Yeah, right.</p> <p>12 MR. STARR: I mean, under the circumstances,</p> <p>13 it's a little -- are we on the record, or are we</p> <p>14 off the record?</p> <p>15 MR. COYNE: Oh, we can do it on the record.</p> <p>16 I mean, yeah, we can do it on the record. I</p> <p>17 mean, I have to take this call right now, so --</p> <p>18 MR. STARR: Yeah, take the call. Take the</p> <p>19 call. Let's go off the record.</p> <p>20 (Whereupon, a short break was</p> <p>21 taken.)</p> <p>22 MR. COYNE: All right. I had to take a call.</p> <p>23 That was the call that I mentioned at the</p> <p>24 beginning at the deposition that I might have to</p>	Page 215	<p>1 given workday. I think we did take a break. I</p> <p>2 mean, it wasn't my break. I didn't ask for the</p> <p>3 break that we took earlier, and we took</p> <p>4 approximately 20 minutes at least, maybe more</p> <p>5 than that.</p> <p>6 I ate lunch during that period of time.</p> <p>7 So if you're trying to squeeze in another break</p> <p>8 for lunch -- which is not what you're doing.</p> <p>9 You already said what you're doing. I can't</p> <p>10 stay past 5:00 today. I don't have that much</p> <p>11 more, but if you need a break at 4:30, quite</p> <p>12 honestly, I'm not going to just wait until 5:00</p> <p>13 and then resume.</p> <p>14 So -- and I know that Allyson wants to</p> <p>15 bring the witness back. I didn't want to bring</p> <p>16 the witness back, and I'm going to try to get</p> <p>17 the show on the road here. But I'm just</p> <p>18 flagging that for you right now.</p> <p>19 MR. COYNE: Right. But --</p> <p>20 MR. STARR: So if you have a conflict arise,</p> <p>21 you have a conflict arise. I get it, but that</p> <p>22 doesn't mean we have to -- we have to stay</p> <p>23 later.</p> <p>24 MR. COYNE: Well, yeah, just so you know, you</p>
Page 214	<p>1 take.</p> <p>2 So as I mentioned earlier, Sean, I</p> <p>3 don't want to rain on your parade. You can go</p> <p>4 as long as you want. It's just that -- and I'm</p> <p>5 going to be able to push it back to at least</p> <p>6 3:00 -- or 4:30. These are matters that I need</p> <p>7 to address that developed today.</p> <p>8 So I -- if we're still going at 4:30,</p> <p>9 I'll just need about a 30 -- I should be able to</p> <p>10 make it in 30 minutes -- a 30-minute break. We</p> <p>11 can resume at 5:00, and you can go as far as you</p> <p>12 want.</p> <p>13 But for the record, I personally have</p> <p>14 not taken any breaks today other than dealing</p> <p>15 with this case. So I have matters dealing --</p> <p>16 pertaining to my law practice -- it's my firm --</p> <p>17 that I need to address personally. And that's</p> <p>18 why I would need to do that at 4:30. I would be</p> <p>19 done by 5:00, and then we can resume. So I just</p> <p>20 wanted to put that on the record so there is no</p> <p>21 surprises.</p> <p>22 MR. STARR: Well, I mean, John, I understand</p> <p>23 that things arise and, you know, conflicts</p> <p>24 happen during the -- you know, the course of a</p>	Page 216	<p>1 talked about a 20-minute lunch break. I did not</p> <p>2 get a -- we had an issue, a break that was</p> <p>3 taken. We resumed it, and then Allyson and I</p> <p>4 agreed we want to take a longer break so I could</p> <p>5 address something.</p> <p>6 The break started with a</p> <p>7 deposition-related matter, all right, and then</p> <p>8 we took a short break. So it was never that we</p> <p>9 took a continuous, agreed 20-minute break. And</p> <p>10 I don't want to quibble on semantics.</p> <p>11 But, you know, we have been going since</p> <p>12 10:30 without a lunch, without a break. I don't</p> <p>13 need a lunch. I'm just saying I have matters</p> <p>14 that I personally have to address for purposes</p> <p>15 of my law practice, because it's my firm. And</p> <p>16 I'm not trying to delay things. I'm just</p> <p>17 saying, I could probably make it in 20 minutes,</p> <p>18 but at 4:30 -- in fact, I probably could push it</p> <p>19 to 4:40. If we're still going -- that's 50</p> <p>20 minutes from now -- I will need a 20-minute</p> <p>21 break. That's all I'm saying.</p> <p>22 MR. STARR: I'm not -- I'm not trying to give</p> <p>23 you a hard time. Let's just go forward and see</p> <p>24 where we're at.</p>

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<p style="text-align: right;">Page 217</p> <p>1 MR. COYNE: Fine. Let's do it.</p> <p>2 MS. WEST: Really quick -- sorry, because I</p> <p>3 need to know for coverage on my end, John, do</p> <p>4 you think you will be able to finish by 4:30 or</p> <p>5 4:45?</p> <p>6 MR. STARR: I'm going to try.</p> <p>7 MS. WEST: Okay.</p> <p>8 MR. COYNE: All right. Let's give it a shot.</p> <p>9 BY MR. STARR:</p> <p>10 <b>Q. Ms. Walker, I understand you've</b></p> <p>11 <b>previously testified that your independent</b></p> <p>12 <b>recollection of the Fletcher case boils down to</b></p> <p>13 <b>you recall that this case involved a bread truck</b></p> <p>14 <b>driver and a robbery; is that correct?</b></p> <p>15 MS. WEST: Asked and answered.</p> <p>16 BY THE WITNESS:</p> <p>17 A. That's part of what I recall, yes.</p> <p>18 BY MR. STARR:</p> <p>19 <b>Q. Okay. Is the other part that you</b></p> <p>20 <b>recall driving in a car with Detectives Bogucki</b></p> <p>21 <b>and Schalk going to an IDOC facility?</b></p> <p>22 A. Yes, I remember that too.</p> <p>23 MS. WEST: Asked and answered.</p> <p>24 BY THE WITNESS:</p>	<p style="text-align: right;">Page 219</p> <p>1 don't remember that I remember his first name.</p> <p>2 <b>Q. Okay. And outside of riding in a</b></p> <p>3 <b>vehicle with him, do you have any other</b></p> <p>4 <b>independent recollection of any other</b></p> <p>5 <b>interactions with him on this case?</b></p> <p>6 A. Not specific, no.</p> <p>7 <b>Q. Do you have any other general</b></p> <p>8 <b>recollections?</b></p> <p>9 A. I remember he was involved in the case,</p> <p>10 but I don't remember, like, a specific</p> <p>11 conversation or, like, I don't remember anything</p> <p>12 specific.</p> <p>13 <b>Q. Did you ever in the -- in the mid-2000s</b></p> <p>14 <b>when you were in Felony Review, did you ever</b></p> <p>15 <b>hear any rumors or allegations about Detective</b></p> <p>16 <b>Bogucki committing misconduct as a Chicago</b></p> <p>17 <b>police officer?</b></p> <p>18 MR. COYNE: Objection, form.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I do not recall that.</p> <p>21 BY MR. STARR:</p> <p>22 <b>Q. Did you ever in your entire career hear</b></p> <p>23 <b>any rumors or allegations about Detective</b></p> <p>24 <b>Bogucki committing misconduct outside of the</b></p>
<p style="text-align: right;">Page 218</p> <p>1 A. I remember that as well.</p> <p>2 BY MR. STARR:</p> <p>3 <b>Q. Is there any other independent</b></p> <p>4 <b>recollection you have about the Willie Sorrell</b></p> <p>5 <b>homicide investigation or the prosecution of</b></p> <p>6 <b>James Fletcher for that -- for that murder?</b></p> <p>7 A. Nothing specific.</p> <p>8 <b>Q. Okay. If at some at some point you</b></p> <p>9 <b>recall something specific, please let us know.</b></p> <p>10 <b>Are you -- during the -- during your</b></p> <p>11 <b>time assigned as a Felony Review State's</b></p> <p>12 <b>Attorney, do you know if you received any</b></p> <p>13 <b>general or progress reports from the Chicago</b></p> <p>14 <b>police on this case?</b></p> <p>15 A. I do not recall.</p> <p>16 <b>Q. Okay. As you sit here today, do you</b></p> <p>17 <b>have a recollection as to whether or not there</b></p> <p>18 <b>were any Chicago police reports that you asked</b></p> <p>19 <b>for but didn't receive?</b></p> <p>20 A. I do not recall.</p> <p>21 <b>Q. Okay. And you testified earlier that</b></p> <p>22 <b>you are -- you're aware of who Jerome Bogucki</b></p> <p>23 <b>is, correct?</b></p> <p>24 A. I'm aware of Detective Bogucki. I</p>	<p style="text-align: right;">Page 220</p> <p>1 <b>confines of this case?</b></p> <p>2 A. I do not recall that.</p> <p>3 <b>Q. Okay. Do you have any opinion of</b></p> <p>4 <b>Detective Bogucki as a Chicago police officer?</b></p> <p>5 MR. COYNE: Objection; form, foundation.</p> <p>6 BY THE WITNESS:</p> <p>7 A. He was -- he was professional with me.</p> <p>8 I -- I -- and -- but I -- I believe I had a few</p> <p>9 cases with him. I know I had more than one with</p> <p>10 him when I was on Felony Review. But I -- I</p> <p>11 don't -- I didn't know him well. And I -- I</p> <p>12 don't even know when the last time it was that I</p> <p>13 saw him.</p> <p>14 BY MR. STARR:</p> <p>15 <b>Q. You previously testified that you're</b></p> <p>16 <b>familiar with a Chicago police detective by the</b></p> <p>17 <b>name of Raymond Schalk; is that correct?</b></p> <p>18 A. Detective Schalk, I don't know the --</p> <p>19 his first name.</p> <p>20 <b>Q. Okay. Other than what you recall about</b></p> <p>21 <b>riding in a vehicle with him going to an IDOC</b></p> <p>22 <b>facility, do you have any other independent</b></p> <p>23 <b>recollection of any interactions or</b></p> <p>24 <b>conversations you had with Detective Schalk</b></p>

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<p style="text-align: right;">Page 221</p> <p>1 <b>during the pendency of this case?</b></p> <p>2 A. I do not.</p> <p>3 <b>Q. Okay. While you were on Felony Review,</b></p> <p>4 <b>did you hear any rumors or allegations of any</b></p> <p>5 <b>misconduct committed by Detective Schalk?</b></p> <p>6 A. I did not.</p> <p>7 MR. COYNE: Objection, form.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I don't recall that. I do not recall</p> <p>10 that.</p> <p>11 BY MR. STARR:</p> <p>12 <b>Q. At any point, have you heard any --</b></p> <p>13 <b>other than this -- strike that.</b></p> <p>14 <b>At any point, have you heard any rumors</b></p> <p>15 <b>of misconduct or allegations of misconduct about</b></p> <p>16 <b>Detective Schalk besides this case?</b></p> <p>17 MR. COYNE: Objection, form.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I do not recall that.</p> <p>20 BY MR. STARR:</p> <p>21 <b>Q. Okay. And do you have any opinion of</b></p> <p>22 <b>Detective Schalk's work as a Chicago police</b></p> <p>23 <b>officer?</b></p> <p>24 MR. COYNE: Objection; form, foundation.</p>	<p style="text-align: right;">Page 223</p> <p>1 A. -- Noradin. I don't believe I know him</p> <p>2 as Anthony Noradin.</p> <p>3 <b>Q. Do you have any independent</b></p> <p>4 <b>recollection of any interactions or</b></p> <p>5 <b>communications or conversations with Detective</b></p> <p>6 <b>Noradin on the Willie Sorrell homicide</b></p> <p>7 <b>investigation or the prosecution of James</b></p> <p>8 <b>Fletcher for that murder?</b></p> <p>9 A. I do not.</p> <p>10 <b>Q. Did you ever hear any rumors or</b></p> <p>11 <b>allegations about Detective Noradin committing</b></p> <p>12 <b>misconduct as a Chicago police officer during</b></p> <p>13 <b>your time in Felony Review?</b></p> <p>14 MR. COYNE: Objection; form, foundation.</p> <p>15 BY THE WITNESS: I do not recall that.</p> <p>16 BY MR. STARR:</p> <p>17 <b>Q. Have you ever heard any rumors or</b></p> <p>18 <b>allegations about Detective Noradin committing</b></p> <p>19 <b>misconduct as a Chicago police officer in your</b></p> <p>20 <b>career?</b></p> <p>21 MR. COYNE: Objection, form.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I -- I do not recall that.</p> <p>24 BY MR. STARR:</p>
<p style="text-align: right;">Page 222</p> <p>1 BY THE WITNESS:</p> <p>2 A. I believe he and Detective Bogucki were</p> <p>3 partners or worked together. I believe I had at</p> <p>4 least one other case with him and Detective</p> <p>5 Bogucki. You know, I -- I remember him as -- as</p> <p>6 being, you know, pleasant and professional with</p> <p>7 me. I have not seen him in quite some time, and</p> <p>8 I -- and I do not know him -- I did not know him</p> <p>9 well.</p> <p>10 I -- I could probably recognize him if</p> <p>11 I was shown a picture, but I don't -- we didn't</p> <p>12 have a lot of -- we didn't have a lot of</p> <p>13 interaction.</p> <p>14 BY MR. STARR:</p> <p>15 <b>Q. I believe you testified about Detective</b></p> <p>16 <b>Noradin earlier.</b></p> <p>17 <b>Do you know who Detective Noradin is?</b></p> <p>18 A. I do know Detective -- I do know who</p> <p>19 Detective Noradin is.</p> <p>20 <b>Q. Okay. And his name is Anthony Noradin.</b></p> <p>21 <b>Do you know his first name?</b></p> <p>22 A. I know him -- I believe I know him as</p> <p>23 Tony --</p> <p>24 <b>Q. Okay.</b></p>	<p style="text-align: right;">Page 224</p> <p>1 <b>Q. And do you have an opinion of him as a</b></p> <p>2 <b>Chicago police officer?</b></p> <p>3 MR. COYNE: Objection, foundation.</p> <p>4 BY THE WITNESS:</p> <p>5 A. He was -- he has been -- he was</p> <p>6 professional and pleasant when I had to deal</p> <p>7 with him. I believe I had a couple of -- a</p> <p>8 couple of other cases with him when he was at</p> <p>9 Area 5, but I can't specifically remember the</p> <p>10 names of those cases or what those cases were</p> <p>11 about. I just -- I knew I've interacted with</p> <p>12 him a -- a couple of times when I was on Felony</p> <p>13 Review, but I don't remember exactly how many</p> <p>14 either.</p> <p>15 BY MR. STARR:</p> <p>16 <b>Q. What about a Chicago police detective</b></p> <p>17 <b>or a sergeant by the name of Tony or Anthony</b></p> <p>18 <b>Wojcik?</b></p> <p>19 <b>Do you know who that is?</b></p> <p>20 A. I have heard the name, but I don't know</p> <p>21 if I -- I'm not getting a picture in my head of</p> <p>22 what he looked like.</p> <p>23 <b>Q. Do you know what context you have heard</b></p> <p>24 <b>the name in?</b></p>

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<p>1 A. Just being around 26th Street. Like, I 2 have heard -- I have heard the name. 3 <b>Q. Do you have any independent</b> 4 <b>recollection whatsoever of any interactions,</b> 5 <b>communications, or conversations with Tony</b> 6 <b>Wojcik during the pendency of the Willie Sorrell</b> 7 <b>criminal investigation -- homicide investigation</b> 8 <b>or the prosecution of James Fletcher for that</b> 9 <b>crime?</b> 10 A. I do not recall that. 11 <b>Q. Did you ever hear any allegations or</b> 12 <b>rumors about Detective Wojcik or Sergeant Wojcik</b> 13 <b>committing any misconduct during your time in</b> 14 <b>Felony Review?</b> 15 MR. COYNE: Objection, form. 16 BY THE WITNESS: 17 A. I do not recall that. 18 BY MR. STARR: 19 <b>Q. Have you heard any rumors of -- or</b> 20 <b>allegations of Detective Wojcik committing</b> 21 <b>misconduct at any point in your career?</b> 22 MR. COYNE: Objection, form. 23 BY THE WITNESS: 24 A. I don't recall that. I -- I don't</p>	<p>1 <b>Q. Do you have any independent</b> 2 <b>recollection of Terry Rogers?</b> 3 A. I do not. 4 <b>Q. You're aware that Terry Rogers</b> 5 <b>allegedly identified James Fletcher to</b> 6 <b>Detectives Bogucki and Schalk, correct?</b> 7 A. I have read that in the police report 8 getting ready for this audition -- this 9 deposition. 10 <b>Q. And allegedly Terry Rogers was able to</b> 11 <b>identify Mr. Fletcher in a photo array that</b> 12 <b>Detectives Bogucki and Schalk showed him,</b> 13 <b>correct?</b> 14 MR. COYNE: Objection, foundation. 15 BY THE WITNESS: 16 A. I have read that in preparation for 17 this deposition. 18 BY MR. STARR: 19 <b>Q. And those photos in the photo array</b> 20 <b>were IDOC photos, correct?</b> 21 MR. COYNE: Same objection. 22 BY THE WITNESS: 23 A. I -- I don't know about that. 24 BY MR. STARR:</p>
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<p>1 recall that. 2 BY MR. STARR: 3 <b>Q. Do you have any opinion of Detective --</b> 4 <b>Sergeant Wojcik as a Chicago police officer?</b> 5 MS. WEST: Objection to foundation. 6 MR. COYNE: Objection; form, foundation. 7 BY THE WITNESS: 8 A. I -- I don't remember having any 9 interaction with Sergeant Wojcik. I don't -- I 10 don't know that I would be able to -- like, if I 11 was shown a line -- a photo array, I don't know 12 that I could pick Sergeant Wojcik out of the 13 photo array. I just don't really know him. 14 Like, I don't know him. 15 BY MR. STARR: 16 <b>Q. Other -- strike that.</b> 17 <b>Do you have any independent</b> 18 <b>recollection whatsoever of interviewing any</b> 19 <b>witness in the Willie Sorrell homicide or the</b> 20 <b>James Fletcher criminal prosecution?</b> 21 A. I do not. 22 <b>Q. Do you have any independent</b> 23 <b>recollection of Mr. Fletcher?</b> 24 A. I do not.</p>	<p>1 <b>Q. You are aware that Terry Rogers</b> 2 <b>allegedly told Detectives Bogucki and Schalk</b> 3 <b>that he knew Mr. Fletcher prior to the Willie</b> 4 <b>Sorrell homicide, correct?</b> 5 A. I have read that in documents preparing 6 for the deposition, yes. 7 <b>Q. Do you know if you -- strike that.</b> 8 <b>Did you do anything to independently</b> 9 <b>corroborate whether or not Terry Rogers knew</b> 10 <b>James Fletcher prior to the Willie homi- --</b> 11 <b>Willie Sorrell homicide?</b> 12 MR. COYNE: Objection, foundation. 13 BY THE WITNESS: 14 A. I don't know. I don't recall. 15 BY MR. STARR: 16 <b>Q. Do you know if the Detectives Bogucki</b> 17 <b>and Schalk did anything to independently</b> 18 <b>corroborate whether or not Mr. Rogers knew</b> 19 <b>Mr. Fletcher prior to the Willie Sorrell</b> 20 <b>homicide?</b> 21 MR. COYNE: Objection -- 22 MS. WEST: Objection, foundation. 23 MR. COYNE: -- foundation. 24 BY THE WITNESS:</p>

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<p style="text-align: right;">Page 229</p> <p>1 A. I don't recall, and I don't know.</p> <p>2 BY MR. STARR:</p> <p>3 <b>Q. Would it surprise you to hear that</b></p> <p>4 <b>Detective Bogucki has testified in this civil</b></p> <p>5 <b>case that he did nothing to corroborate whether</b></p> <p>6 <b>or not Terry Rogers knew James Fletcher prior to</b></p> <p>7 <b>the Willie Sorrell homicide?</b></p> <p>8 MS. WEST: Objection.</p> <p>9 MR. COYNE: Objection to form, foundation,</p> <p>10 speculation.</p> <p>11 MS. WEST: Join and misstates the record.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I don't -- I don't know. I -- I would</p> <p>14 need to know more about that to -- to be able --</p> <p>15 it would be speculation for me to say how I feel</p> <p>16 about that.</p> <p>17 BY MR. STARR:</p> <p>18 <b>Q. Well, you understand that Terry Rogers</b></p> <p>19 <b>said that he could identify James Fletcher</b></p> <p>20 <b>because he knew him prior to the crime, correct?</b></p> <p>21 MR. COYNE: Objection, foundation.</p> <p>22 MS. WEST: Join.</p> <p>23 MR. COYNE: And also mischaracterizes the</p> <p>24 witness's testimony.</p>	<p style="text-align: right;">Page 231</p> <p>1 evidence in this case, strategies, opinions,</p> <p>2 legal theories, arguments, then I would instruct</p> <p>3 you not to answer the question based upon</p> <p>4 Federal Rule 26 and the work product doctrine.</p> <p>5 If you can answer the question without</p> <p>6 doing so, then you may proceed.</p> <p>7 MR. HOLMES: Same guidance and instruction on</p> <p>8 behalf of the Office on grounds of deliberative</p> <p>9 process privilege.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't think I can answer that</p> <p>12 question based off of the -- off of work product</p> <p>13 and the -- and my own deliberation.</p> <p>14 BY MR. STARR:</p> <p>15 <b>Q. So are you going to take your</b></p> <p>16 <b>attorney's recommendation and refuse to answer</b></p> <p>17 <b>my question?</b></p> <p>18 A. Respectfully, yes.</p> <p>19 <b>Q. Okay. Did you have any concerns that</b></p> <p>20 <b>Terry Roger's identification of James Fletcher</b></p> <p>21 <b>was not credible?</b></p> <p>22 MR. COYNE: Objection; form, foundation.</p> <p>23 Also, the same instruction is, if you're talking</p> <p>24 about your -- if you would need to reveal your</p>
<p style="text-align: right;">Page 230</p> <p>1 MS. WEST: Yes. Join.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I understand I have read some things in</p> <p>4 some reports and documents to prepare for this</p> <p>5 deposition today that say -- that say the gist</p> <p>6 of what you just said.</p> <p>7 BY MR. STARR:</p> <p>8 <b>Q. Okay. Given that, would you expect --</b></p> <p>9 <b>in your experience as a Felony Review State's</b></p> <p>10 <b>Attorney, would you expect and anticipate the</b></p> <p>11 <b>police to have corroborated that piece of</b></p> <p>12 <b>evidence?</b></p> <p>13 MR. COYNE: Objection; form, foundation,</p> <p>14 incomplete hypothetical. Requires speculation.</p> <p>15 MS. WEST: Join.</p> <p>16 BY THE WITNESS:</p> <p>17 A. Not necessarily.</p> <p>18 BY MR. STARR:</p> <p>19 <b>Q. Why would you not expect them to</b></p> <p>20 <b>corroborate that?</b></p> <p>21 MR. COYNE: Objection.</p> <p>22 Also, Jennifer, I will repeat the</p> <p>23 earlier instruction. If you have to offer your</p> <p>24 opinion, your mental impressions about the</p>	<p style="text-align: right;">Page 232</p> <p>1 mental impressions about the evidence in this</p> <p>2 case, same instruction.</p> <p>3 MR. HOLMES: Same objection and instruction</p> <p>4 on behalf of the Office on grounds of</p> <p>5 deliberative process privilege.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Could you repeat the question, please?</p> <p>8 BY MR. STARR:</p> <p>9 <b>Q. Yeah.</b></p> <p>10 <b>Did you have any concerns that Terry</b></p> <p>11 <b>Rogers's identification of James Fletcher was</b></p> <p>12 <b>not credible when you were at Cook County</b></p> <p>13 <b>State's Attorney -- Felony Review with the</b></p> <p>14 <b>State's Attorney?</b></p> <p>15 MR. COYNE: Same objection. Same instruction</p> <p>16 on work product.</p> <p>17 MR. HOLMES: Likewise, as to the State's</p> <p>18 Attorney's Office as to deliberative process</p> <p>19 privilege.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I don't recall.</p> <p>22 BY MR. STARR:</p> <p>23 <b>Q. Okay. If you had had evidence that</b></p> <p>24 <b>Terry Rogers's identification of James Fletcher</b></p>



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<p style="text-align: right;">Page 233</p> <p>1     <b>was false, is that something that you would have</b>  2     <b>necessarily documented?</b>  3     MR. COYNE: Objection; form, foundation,  4     incomplete hypothetical. Requires the witness  5     to speculate.  6     BY THE WITNESS:  7     A. I can't answer that question without  8     speculating.  9     BY MR. STARR:  10    <b>Q. Well, don't you -- wouldn't you have</b>  11    <b>had an ethical and a legal obligation under</b>  12    <b>Brady to document that information, if you had</b>  13    <b>learned that Terry's Rogers's identification of</b>  14    <b>Mr. Fletcher was false?</b>  15    MR. COYNE: Objection; form, foundation,  16    incomplete hypothetical. Requires the witness  17    to speculate.  18    MR. HOLMES: 26(a)(2) objection as to the  19    Office.  20    BY THE WITNESS:  21    A. I don't believe I can fully answer that  22    question without speculating, so I -- I can't  23    answer that.  24    BY MR. STARR:</p>	<p style="text-align: right;">Page 235</p> <p>1     <b>Edward Cooper that we looked at, which was</b>  2     <b>Exhibit No. 7; is that correct?</b>  3     A. I believe so.  4     <b>Q. Are you aware that Edward Cooper has</b>  5     <b>testified in this civil matter in a deposition</b>  6     <b>that in 2002, two white police officers came to</b>  7     <b>his home and told them -- told him who to</b>  8     <b>identify in this case?</b>  9     A. I am unaware of any deposition  10    testimony by Mr. Cooper.  11    <b>Q. Are you aware that Mr. Cooper has</b>  12    <b>testified that he was -- that he told the two</b>  13    <b>white officers that he was unable to identify</b>  14    <b>the suspect in the Willie Sorrell shooting?</b>  15    A. I am not aware of that.  16    <b>Q. Did the police ever provide you with</b>  17    <b>any documentation that Edward Cooper told them</b>  18    <b>in 2002 that he was unable to identify James</b>  19    <b>Fletcher?</b>  20    A. I am -- don't recall.  21    <b>Q. If the police had told you or provided</b>  22    <b>you with documentation that Edward Cooper had</b>  23    <b>told them in 2002 that he was unable to identify</b>  24    <b>anyone in the Willie Sorrell shooting, is that</b></p>
<p style="text-align: right;">Page 234</p> <p>1     <b>Q. Were you aware that Terry Rogers had a</b>  2     <b>pending felony charge when he identified James</b>  3     <b>Fletcher?</b>  4     A. I don't recall.  5     <b>Q. Do you have any independent</b>  6     <b>recollection of the witness Edward Cooper?</b>  7     A. I do not.  8     <b>Q. And you're aware that Mr. Cooper</b>  9     <b>testified -- strike that.</b>  10    <b>Are you aware that Mr. Cooper testified</b>  11    <b>at James Fletcher's criminal trial?</b>  12    A. I am not.  13    <b>Q. Are you aware that Mr. Cooper has</b>  14    <b>recanted his identification of James Fletcher</b>  15    <b>since the time that he testified?</b>  16    A. I think I was shown a document this --  17    well, sometime today -- I don't even know what  18    time it is -- when the -- when Ms. West was  19    questioning me that may have indicated that, but  20    I -- I didn't review that as well as some of the  21    other documents. So I'm -- I -- I may have  22    learned that today.  23    <b>Q. Okay. I think you were probably</b>  24    <b>referring to the affidavit or the declaration of</b></p>	<p style="text-align: right;">Page 236</p> <p>1     <b>something that you would have documented or</b>  2     <b>captured in the file?</b>  3     MR. COYNE: Objection; form, foundation.  4     Requires the witness to speculate. Incomplete  5     hypothetical.  6     BY THE WITNESS:  7     A. It -- it may. But it -- it would  8     require me to speculate, so I'm not 100 percent  9     comfortable answering that question.  10    BY MR. STARR:  11    <b>Q. Are you aware that Edward Cooper has</b>  12    <b>testified that the police showed him a photo</b>  13    <b>array and pointed out a photo and told him that</b>  14    <b>was the suspect?</b>  15    A. I'm unaware of whatever -- I'm unaware  16    of Edward Cooper testifying really in anything.  17    <b>Q. Did the police ever tell you or provide</b>  18    <b>you with any documentation that they showed</b>  19    <b>Edward Cooper a photo array and pointed out the</b>  20    <b>suspect?</b>  21    A. That they showed him a photo array and  22    that the police pointed out a suspect to Cooper?  23    <b>Q. Correct.</b>  24    A. I am -- I am not aware of that.</p>



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Page 237	<p>1 <b>Q. If the police had told you that they</b></p> <p>2 <b>had shown Cooper a photo array and pointed out</b></p> <p>3 <b>the suspect in the photo array for Cooper, is</b></p> <p>4 <b>that something that you would have necessarily</b></p> <p>5 <b>had an obligation to document or capture in the</b></p> <p>6 <b>State's Attorney's file?</b></p> <p>7 MR. COYNE: Objection; form, foundation,</p> <p>8 incomplete hypothetical. It requires the</p> <p>9 witness to speculate.</p> <p>10 MR. HOLMES: 26(a)(2) objection on behalf of</p> <p>11 the Office.</p> <p>12 BY THE WITNESS:</p> <p>13 A. It would require me to speculate to</p> <p>14 give a complete answer. But if the police told</p> <p>15 me that they -- well, it would require me to</p> <p>16 speculate, and I don't think I could answer that</p> <p>17 question.</p> <p>18 BY MR. STARR:</p> <p>19 <b>Q. Well, if the police told you that they</b></p> <p>20 <b>unduly influenced the photo array in this case,</b></p> <p>21 <b>what would you have done?</b></p> <p>22 MR. COYNE: Objection; form, foundation,</p> <p>23 incomplete hypothetical. Requires the witness</p> <p>24 the speculate, and I would further admonish you</p>	Page 239	<p>1 <b>Q. If Ed Cooper had told you that the</b></p> <p>2 <b>police had unduly influenced him to identify</b></p> <p>3 <b>somebody, wouldn't it have been mindful of your</b></p> <p>4 <b>obligations as a prosecutor to document that</b></p> <p>5 <b>somewhere?</b></p> <p>6 MR. COYNE: Objection; form, foundation.</p> <p>7 Incomplete hypothetical and requires the witness</p> <p>8 to speculate.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I would be mindful of my obligations as</p> <p>11 a prosecutor, but I cannot -- I can't answer</p> <p>12 that question, which is a hypothetical question</p> <p>13 that requires me to speculate.</p> <p>14 BY MR. STARR:</p> <p>15 <b>Q. Well, since there is nothing in the</b></p> <p>16 <b>record that indicates that you documented that</b></p> <p>17 <b>Ed Cooper told you that the police had unduly</b></p> <p>18 <b>influenced him to identify Mr. Fletcher, is it</b></p> <p>19 <b>safe to assume that you never learned that from</b></p> <p>20 <b>him?</b></p> <p>21 MR. COYNE: Objection; form, foundation.</p> <p>22 Incomplete hypothetical. Requires speculation</p> <p>23 and argumentative.</p> <p>24 MS. WEST: Join.</p>
Page 238	<p>1 as to the Rule 26 instruction I gave you earlier</p> <p>2 about revealing your decision-making process as</p> <p>3 an attorney in this case.</p> <p>4 BY THE WITNESS:</p> <p>5 A. I would have been mindful of my ethical</p> <p>6 obligations as a prosecutor, and -- but I -- I</p> <p>7 cannot answer that question without getting into</p> <p>8 my deliberative processes and work product</p> <p>9 information.</p> <p>10 BY MR. STARR:</p> <p>11 <b>Q. Because there is nothing in the record</b></p> <p>12 <b>to indicate that you ever documented that the</b></p> <p>13 <b>police, in fact, told you that they unduly</b></p> <p>14 <b>influenced a photo array with Ed Cooper, is it</b></p> <p>15 <b>safe to assume that you never learned that?</b></p> <p>16 MR. COYNE: Objection; form and foundation.</p> <p>17 Incomplete hypothetical. Requires speculation</p> <p>18 and argumentative.</p> <p>19 MS. WEST: Join.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I certainly don't recall that, but what</p> <p>22 you're asking me to do is -- is to speculate,</p> <p>23 and I can't do that either.</p> <p>24 BY MR. STARR:</p>	Page 240	<p>1 BY THE WITNESS:</p> <p>2 A. While I was on review, I was mindful of</p> <p>3 my ethical obligations as a prosecutor. To</p> <p>4 answer that question would require me to</p> <p>5 speculate, though.</p> <p>6 BY MR. STARR:</p> <p>7 <b>Q. Are you aware that Ed Cooper has</b></p> <p>8 <b>testified that when he went to see a lineup at</b></p> <p>9 <b>the police station a few days later, Detectives</b></p> <p>10 <b>Bogucki and Schalk may have shown him the same</b></p> <p>11 <b>photo that he previously had seen at his house?</b></p> <p>12 A. I'm unaware of Ed -- of Mr. Cooper's</p> <p>13 testimony. So I don't know what he -- he has</p> <p>14 testified to.</p> <p>15 <b>Q. If the police -- strike that.</b></p> <p>16 <b>Did the police ever tell you that they</b></p> <p>17 <b>provided -- strike that.</b></p> <p>18 <b>Did Detectives Bogucki and Schalk ever</b></p> <p>19 <b>tell you that when Ed Cooper came to view the</b></p> <p>20 <b>lineup at the police station, they showed him</b></p> <p>21 <b>James Fletcher's photo prior to viewing the</b></p> <p>22 <b>lineup?</b></p> <p>23 A. I don't recall that.</p> <p>24 <b>Q. If the police had told you that they</b></p>

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Page 241	<p>1 had shown Ed Cooper James Fletcher's photo prior</p> <p>2 to him viewing the lineup, is that something</p> <p>3 that you would have documented or captured</p> <p>4 within the State's Attorney's file?</p> <p>5 MR. COYNE: Objection; form, foundation.</p> <p>6 Incomplete hypothetical. Requires the witness</p> <p>7 to speculate.</p> <p>8 MS. WEST: Join.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I can't answer that, because it would</p> <p>11 require me to speculate, but I would be mindful</p> <p>12 of my ethical obligations as a prosecutor.</p> <p>13 BY MR. STARR:</p> <p>14 Q. Did Ed Cooper ever tell you that when</p> <p>15 he went to view the lineup at the police</p> <p>16 station, the police showed him a photo of James</p> <p>17 Fletcher prior to viewing the lineup?</p> <p>18 A. I don't have an independent basis of</p> <p>19 knowledge for any conversation I may or may not</p> <p>20 have had with Mr. Cooper.</p> <p>21 Q. If Ed Cooper had told you that when he</p> <p>22 went to view a lineup at the Chicago Police</p> <p>23 Department, they showed him a photo of James</p> <p>24 Fletcher and told him, "Remember, this is the</p>	Page 243	<p>1 BY MR. STARR:</p> <p>2 Q. Did Ed Cooper tell you anything</p> <p>3 exculpatory about the Willie Sorrell homicide</p> <p>4 investigation that you didn't document?</p> <p>5 A. I don't recall a -- conversations with</p> <p>6 Mr. Cooper. I have no independent recollection.</p> <p>7 Q. Do you have any independent</p> <p>8 recollection of a witness by the name of Sheene</p> <p>9 Friend?</p> <p>10 A. I do not have an independent</p> <p>11 recollection of Sheene Friend.</p> <p>12 Q. Are you aware that Friend's testimony</p> <p>13 helped convict James Fletcher?</p> <p>14 A. I am unaware of what happened at trial.</p> <p>15 Q. Are you aware that Sheene Friend has</p> <p>16 signed a declaration recanting her</p> <p>17 identification of James Fletcher in the Willie</p> <p>18 Sorrell homicide?</p> <p>19 A. I don't recall that.</p> <p>20 Q. Okay. Are you aware that -- strike</p> <p>21 that.</p> <p>22 Are you aware that Sheene Friend's</p> <p>23 declaration states that she told police she</p> <p>24 could not identify the shooter in the Willie</p>
Page 242	<p>1 guy you identified in the photo array," is that</p> <p>2 something that you would have had to necessarily</p> <p>3 document as a Cook County State's Attorney?</p> <p>4 MR. COYNE: Objection; form, foundation.</p> <p>5 Incomplete hypothetical. It requires the</p> <p>6 witness to speculate.</p> <p>7 BY THE WITNESS:</p> <p>8 A. It requires -- I can't answer that</p> <p>9 question. It requires me to speculate. But I</p> <p>10 was -- when I was on review and today I am</p> <p>11 mindful of my ethical obligations as a</p> <p>12 prosecutor.</p> <p>13 BY MR. STARR:</p> <p>14 Q. And because there is nothing in the</p> <p>15 file or in the record to indicate that you</p> <p>16 documented that you learned that either from the</p> <p>17 police or from Ed Cooper himself, is it safe to</p> <p>18 assume that you never learned that?</p> <p>19 MR. COYNE: Objection; form, foundation.</p> <p>20 Requires speculation. Incomplete hypothetical</p> <p>21 and argumentative.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I can't answer that question, because</p> <p>24 it requires me to speculate.</p>	Page 244	<p>1 Sorrell homicide?</p> <p>2 A. I don't recall ever seeing that</p> <p>3 declaration.</p> <p>4 Q. Did the police ever tell you or provide</p> <p>5 you with any documentation that Sheene Friend</p> <p>6 told them that she was unable to make an</p> <p>7 identification in the Sorrell shooting?</p> <p>8 A. I don't recall that.</p> <p>9 Q. If the police had told you that Sheene</p> <p>10 Friend was unable to make an identification in</p> <p>11 the Sorrell shooting, is that something that you</p> <p>12 would have documented or captured within the</p> <p>13 State's Attorney's file.</p> <p>14 MR. COYNE: Objection; form, foundation.</p> <p>15 Incomplete hypothetical. Requires the witness</p> <p>16 to speculate.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I can't answer that question, because</p> <p>19 it requires me to speculate.</p> <p>20 BY MR. STARR:</p> <p>21 Q. Are you aware that Sheene Friend has</p> <p>22 stated that when the police showed her a photo</p> <p>23 array, she identified someone other than James</p> <p>24 Fletcher?</p>

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Page 245	<p>1 A. I'm -- I'm unaware of having a -- I</p> <p>2 have no independent recollection of having a</p> <p>3 conversation with Ms. Friend. I am unaware of</p> <p>4 what she has -- has said in this case. And I --</p> <p>5 I have no independent recollection of that.</p> <p>6 <b>Q. Are you aware that Sheene Friend has</b></p> <p>7 <b>stated that after she identified someone</b></p> <p>8 <b>different in the photo array, the police pointed</b></p> <p>9 <b>her at James Fletcher's photograph?</b></p> <p>10 A. I'm not aware of that --</p> <p>11 MS. WEST: Misstates -- sorry. Let me just</p> <p>12 get a belated objection on --</p> <p>13 THE WITNESS: Sorry.</p> <p>14 MS. WEST: -- that it misstates the record.</p> <p>15 Go ahead.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I am not aware of that.</p> <p>18 BY MR. STARR:</p> <p>19 <b>Q. Did Sheene Friend ever tell you that</b></p> <p>20 <b>the police unduly influenced her identification</b></p> <p>21 <b>of James Fletcher?</b></p> <p>22 A. I do not recall that.</p> <p>23 <b>Q. If Sheene Friend had told you that the</b></p> <p>24 <b>police unduly influenced her identification of</b></p>	Page 247	<p>1 MR. COYNE: Objection. Mischaracterizes the</p> <p>2 testimony and assume facts not in evidence,</p> <p>3 form.</p> <p>4 And I would remind you of the</p> <p>5 admonition previously given, Ms. Walker, under</p> <p>6 Federal Rule 26 regarding your work product</p> <p>7 doctrine privilege.</p> <p>8 MR. HOLMES: Joined as to the Office as to</p> <p>9 deliberative process privilege.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't recall that. I don't recall --</p> <p>12 I don't have an independent basis of knowledge</p> <p>13 for -- for any conversation I may have had with</p> <p>14 Ms. Friend.</p> <p>15 BY MR. STARR:</p> <p>16 <b>Q. If you had learned any evidence --</b></p> <p>17 <b>strike that.</b></p> <p>18 <b>If you had learned that Sheene Friend's</b></p> <p>19 <b>identification of James Fletcher was false,</b></p> <p>20 <b>would you have turned -- would you have</b></p> <p>21 <b>documented that or captured that information in</b></p> <p>22 <b>the State's Attorney's file?</b></p> <p>23 MR. COYNE: Objection; form, foundation.</p> <p>24 Requires speculation. Incomplete hypothetical.</p>
Page 246	<p>1 <b>James Fletcher in the Willie Sorrell homicide,</b></p> <p>2 <b>would you have necessarily documented that or</b></p> <p>3 <b>captured it within the State's Attorney's file?</b></p> <p>4 MR. COYNE: Objection; form, foundation.</p> <p>5 Incomplete hypothetical and requires the witness</p> <p>6 to speculate.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Because I would have to speculate to</p> <p>9 answer that question, I cannot answer it.</p> <p>10 BY MR. STARR:</p> <p>11 <b>Q. Because there is no documentation in</b></p> <p>12 <b>the record that you ever indicated that either</b></p> <p>13 <b>the police or Sheene Friend told you that they</b></p> <p>14 <b>had un- -- the police had unduly influenced her</b></p> <p>15 <b>identification of James Fletcher, is it safe to</b></p> <p>16 <b>assume that you never learned that?</b></p> <p>17 MR. COYNE: Objection. Form, foundation,</p> <p>18 incomplete hypothetical, and argumentative.</p> <p>19 BY THE WITNESS:</p> <p>20 A. It -- I would have to speculate to</p> <p>21 answer that question, so I can't.</p> <p>22 BY MR. STARR:</p> <p>23 <b>Q. You had concerns about Sheene Friend's</b></p> <p>24 <b>identification of James Fletcher, correct?</b></p>	Page 248	<p>1 BY THE WITNESS:</p> <p>2 A. I can't answer that question without</p> <p>3 speculating, so I'm not able to answer.</p> <p>4 BY MR. STARR:</p> <p>5 <b>Q. If you had learned that Sheene</b></p> <p>6 <b>Friend -- strike that.</b></p> <p>7 <b>If Sheene Friend told you that she had</b></p> <p>8 <b>falsely identified James Fletcher, you would</b></p> <p>9 <b>have an ethical obligation and duty to disclose</b></p> <p>10 <b>that; wouldn't you have?</b></p> <p>11 MR. COYNE: Objection; form, foundation,</p> <p>12 incomplete hypothetical, and requires the</p> <p>13 witness to speculate.</p> <p>14 MR. HOLMES: 26(a)(2) objection as to the</p> <p>15 Office.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I can't answer that question without</p> <p>18 speculating.</p> <p>19 BY MR. STARR:</p> <p>20 <b>Q. Did Sheene Friend tell you anything</b></p> <p>21 <b>exculpatory about the Willie Sorrell homicide</b></p> <p>22 <b>and the criminal prosecution of James Fletcher</b></p> <p>23 <b>that you did not document?</b></p> <p>24 MR. COYNE: Foundation.</p>

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Page 249	<p>1 BY THE WITNESS:</p> <p>2 A. I do not recall and I do not have an</p> <p>3 independent basis of knowledge as to what</p> <p>4 Ms. Friend may or may not have told me.</p> <p>5 BY MR. STARR:</p> <p>6 <b>Q. Sheene Friend also had pending criminal</b></p> <p>7 <b>charges against her when she was interviewed by</b></p> <p>8 <b>the Chicago police; isn't that correct?</b></p> <p>9 MR. COYNE: Objection, foundation.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I do not recall that.</p> <p>12 BY MR. STARR:</p> <p>13 <b>Q. Do you know if there were any deals or</b></p> <p>14 <b>promises made to Sheene Friend in exchange for</b></p> <p>15 <b>her statement?</b></p> <p>16 MR. COYNE: Objection, form.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I do not -- I do not recall that, and I</p> <p>19 do not know.</p> <p>20 BY MR. STARR:</p> <p>21 <b>Q. Do you have any independent</b></p> <p>22 <b>recollection of a witness by the name of Emmett</b></p> <p>23 <b>Wade?</b></p> <p>24 A. I -- I do not.</p>	Page 251	<p>1 Go ahead.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I am aware of the declaration that</p> <p>4 we -- was used an exhibit earlier today.</p> <p>5 BY MR. STARR:</p> <p>6 <b>Q. Did the police ever tell you that they</b></p> <p>7 <b>went to Willie Sorrell's home and showed him a</b></p> <p>8 <b>single photo of James Fletcher and asked him to</b></p> <p>9 <b>identify him as the shooter in the Willie</b></p> <p>10 <b>Sorrell homicide?</b></p> <p>11 A. I do not recall that.</p> <p>12 <b>Q. If the police had told you that they</b></p> <p>13 <b>had done that, is that something that you would</b></p> <p>14 <b>have documented or captured within the State's</b></p> <p>15 <b>Attorney's file?</b></p> <p>16 MR. COYNE: Objection; form, foundation.</p> <p>17 Incomplete hypothetical and requires the witness</p> <p>18 to speculate.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I can't answer that, as it requires me</p> <p>21 to speculate.</p> <p>22 BY MR. STARR:</p> <p>23 <b>Q. Did Emmett Wade ever tell you that the</b></p> <p>24 <b>police showed him a single photo and asked him</b></p>
Page 250	<p>1 <b>Q. Do you know whether or not you actually</b></p> <p>2 <b>were the person that went out to Emmett Wade's</b></p> <p>3 <b>home with Detectives Bogucki and Schalk?</b></p> <p>4 A. I don't -- I don't have a recollection</p> <p>5 of -- of that conversation, so I can't say.</p> <p>6 <b>Q. Do you recall that exhibit we looked at</b></p> <p>7 <b>earlier that -- the declarations of Emmett Wade</b></p> <p>8 <b>in which he indicated that the detectives came</b></p> <p>9 <b>out with what he thought was a tall, slender</b></p> <p>10 <b>State's Attorney, correct?</b></p> <p>11 A. I -- I saw that, yes. I read that.</p> <p>12 <b>Q. All right. Are you aware of any other</b></p> <p>13 <b>State's Attorneys that worked on the Willie</b></p> <p>14 <b>Sorrell homicide investigation?</b></p> <p>15 A. In the Felony Review stage?</p> <p>16 <b>Q. Yes.</b></p> <p>17 A. I am not.</p> <p>18 <b>Q. Are you aware that Emmett Wade has</b></p> <p>19 <b>signed a declaration stating that the police</b></p> <p>20 <b>came to his home and showed him a single photo</b></p> <p>21 <b>of someone named Fletcher and asked him to</b></p> <p>22 <b>identify him in the Willie Sorrell shooting?</b></p> <p>23 MR. COYNE: Object as to form. Asked and</p> <p>24 answered.</p>	Page 252	<p>1 <b>to identify that photo as the person who shot</b></p> <p>2 <b>Willie Sorrell?</b></p> <p>3 A. I do not recall that.</p> <p>4 <b>Q. If the police -- if Emmett Wade had</b></p> <p>5 <b>told you that the police had showed him a single</b></p> <p>6 <b>photo of James Fletcher and asked him to</b></p> <p>7 <b>identify James Fletcher as the shooter of the</b></p> <p>8 <b>Sorrell homicide, is that something that you</b></p> <p>9 <b>would have documented or captured within the</b></p> <p>10 <b>State's Attorney file?</b></p> <p>11 MR. COYNE: Objection; form, foundation.</p> <p>12 Incomplete hypothetical and requires the witness</p> <p>13 to speculate.</p> <p>14 BY THE WITNESS:</p> <p>15 A. As I would have to speculate, I</p> <p>16 would -- I can't answer that question.</p> <p>17 BY MR. STARR:</p> <p>18 <b>Q. Because we have no document -- strike</b></p> <p>19 <b>that.</b></p> <p>20 <b>Because there is no documentation in</b></p> <p>21 <b>the record that was made by you that you learned</b></p> <p>22 <b>either from the police or from Mr. Wade that the</b></p> <p>23 <b>police showed Mr. Wade a single photo of James</b></p> <p>24 <b>Fletcher and asked him to ID him as the shooter</b></p>

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<p style="text-align: right;">Page 253</p> <p>1 <b>in the Sorrell homicide, is it safe to assume</b>  2 <b>that you never learned that?</b>  3 MR. COYNE: Objection; form, foundation,  4 incomplete hypothetical. Requires speculation  5 and argumentative.  6 BY THE WITNESS:  7 A. I can't answer that, because it  8 requires me to speculate.  9 BY MR. STARR:  10 <b>Q. Are you aware that Mr. Wade has</b>  11 <b>testified in this civil case that when the</b>  12 <b>police came to his house and showed him the</b>  13 <b>single photograph, that the person that he</b>  14 <b>thought was the State's Attorney was also</b>  15 <b>present in his home?</b>  16 A. I'm unaware of any testimony in the  17 civil case. I am unaware of any other testimony  18 given by Mr. Wade.  19 <b>Q. Are you aware that Mr. Wade has</b>  20 <b>testified in this civil case that when the</b>  21 <b>police showed him the single photo, he has</b>  22 <b>testified that he does not think that the</b>  23 <b>State's Attorney was within physical proximity</b>  24 <b>enough to see what was happening between him and</b></p>	<p style="text-align: right;">Page 255</p> <p>1 A. I don't have any independent  2 recollection of speaking with Mr. Wade.  3 <b>Q. Did Mr. Wade tell you anything about</b>  4 <b>his inability or ability to identify</b>  5 <b>Mr. Fletcher in the shooting of Willie Sorrell?</b>  6 A. I don't have any independent  7 recollection of a conversation with Mr. Wade.  8 <b>Q. Do you have any involvement in the</b>  9 <b>appeal that Mr. Fletcher filed?</b>  10 A. No.  11 <b>Q. Were you contacted at all during the</b>  12 <b>pendency of Mr. Fletcher's postconviction</b>  13 <b>petition by anybody in the State's Attorney's</b>  14 <b>Office to opine about your role in the case?</b>  15 MR. HOLMES: I object on behalf of the  16 State's Attorney's Office on grounds of  17 deliberative process privilege and instruct the  18 witness not to answer to the extent that her  19 answer would reflect communications or  20 deliberations by the Office in regard to any  21 appeal proceedings involving Mr. Fletcher.  22 MR. COYNE: Yeah. Actually, can I hear the  23 question back, too, Kari? Part of it I didn't  24 hear.</p>
<p style="text-align: right;">Page 254</p> <p>1 <b>the police?</b>  2 A. I'm unaware of -- of Mr. Wade's -- the  3 contents of Mr. Wade's testimony in the civil  4 case. And until you said he did, I'm unaware  5 that he testified at all.  6 <b>Q. If Mr. Wade has testified that based on</b>  7 <b>his recollection the person he thought was the</b>  8 <b>State's Attorney was not in a physical proximity</b>  9 <b>to see what the police were showing him, do you</b>  10 <b>have any reason to doubt his representation?</b>  11 MS. WEST: Objection.  12 MR. COYNE: Objection; form, foundation,  13 incomplete hypothetical and requires  14 speculation.  15 MS. WEST: Objection. Misstates the record  16 and speculation.  17 BY THE WITNESS:  18 A. Because I would have to speculate, I  19 cannot answer.  20 BY MR. STARR:  21 <b>Q. Did Mr. Wade tell you anything</b>  22 <b>exculpatory about the police investigation into</b>  23 <b>the shooting of Willie Sorrell or the criminal</b>  24 <b>prosecution of James Fletcher?</b></p>	<p style="text-align: right;">Page 256</p> <p>1 MR. STARR: Let me -- let me just ask it  2 again. I will ask it -- I don't know if this is  3 going to solve the problem.  4 BY MR. STARR:  5 <b>Q. Did you have -- do you recall having</b>  6 <b>any involvement in the postconviction</b>  7 <b>proceedings of James Fletcher?</b>  8 A. I do not recall that.  9 <b>Q. Did anyone interview you during the</b>  10 <b>pendency of the postconviction petition that</b>  11 <b>James Fletcher filed in his case?</b>  12 MR. HOLMES: Objection. I --  13 THE WITNESS: Sure.  14 MR. HOLMES: The objection is on the grounds  15 of deliberative process privilege on behalf of  16 the Office and instruct the witness not to  17 answer to the extent her answer would reveal  18 communications or deliberations of the office in  19 regard to those proceedings just referenced by  20 counsel.  21 BY THE WITNESS:  22 A. I do not recall that happening.  23 BY MR. STARR:  24 <b>Q. Okay. I have to ask you some specific</b></p>

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Page 257	<p>1 questions about your awareness of police</p> <p>2 misconduct that have been alleged in this case.</p> <p>3 The defendants in Mr. Fletcher's civil case made</p> <p>4 claim that the prosecutors had knowledge of the</p> <p>5 defendant's alleged mis- -- police misconduct.</p> <p>6 Given your answers about your independent</p> <p>7 recollection, we may have to approach some of</p> <p>8 these question as hypothetical, but I'm going to</p> <p>9 ask them anyways.</p> <p>10 Ma'am, did you obstruct James</p> <p>11 Fletcher's right to counsel?</p> <p>12 MR. COYNE: Objection; form, foundation.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I don't recall that.</p> <p>15 BY MR. STARR:</p> <p>16 Q. Okay. Were you aware at any point</p> <p>17 during the prosecution -- strike that.</p> <p>18 Were you aware at any point during the</p> <p>19 investigation of the Willie Sorrell homicide or</p> <p>20 the prosecution of James Fletcher for that crime</p> <p>21 that the Chicago police engaged in misconduct?</p> <p>22 A. I--</p> <p>23 MR. COYNE: Objection to form.</p> <p>24 BY THE WITNESS:</p>	Page 259	<p>1 Mr. Fletcher?</p> <p>2 MR. COYNE: Objection, form.</p> <p>3 THE WITNESS: I am not aware of that.</p> <p>4 BY MR. STARR:</p> <p>5 Q. During the pendency of the Sorrell</p> <p>6 homicide investigation and the prosecution of</p> <p>7 James Fletcher, did you ever become aware of any</p> <p>8 undisclosed Chicago police reports?</p> <p>9 MR. COYNE: Objection, foundation and form.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Undisclosed to who?</p> <p>12 BY MR. STARR:</p> <p>13 Q. Undisclosed to the criminal defense.</p> <p>14 A. I am not aware of that.</p> <p>15 Q. During the pendency of the Willie</p> <p>16 Sorrell homicide investigation and the</p> <p>17 prosecution of James Fletcher, did you ever</p> <p>18 become aware of any false facts in any of the</p> <p>19 Chicago police reports?</p> <p>20 MR. COYNE: Objection, form.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I am not aware of that.</p> <p>23 BY MR. STARR:</p> <p>24 Q. During the pendency of the Willie</p>
Page 258	<p>1 A. I am not aware of that.</p> <p>2 BY MR. STARR:</p> <p>3 Q. During the investigation of the Willie</p> <p>4 Sorrell homicide and the prosecution of James</p> <p>5 Fletcher, did you become aware at any point that</p> <p>6 the Chicago police engaged in witness coercion</p> <p>7 in this case?</p> <p>8 MR. COYNE: Objection, form.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I'm not aware of that.</p> <p>11 BY MR. STARR:</p> <p>12 Q. Did you ever become aware that the</p> <p>13 Chicago police made promises to any of the</p> <p>14 witnesses in this case?</p> <p>15 MR. COYNE: Objection, form.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I am not aware of that.</p> <p>18 BY MR. STARR:</p> <p>19 Q. Did you ever become aware that the</p> <p>20 Chicago police threatened any of the witnesses</p> <p>21 in this case?</p> <p>22 A. I am not aware of that.</p> <p>23 Q. Did you ever become aware that Chicago</p> <p>24 police fed facts to the witnesses to implicate</p>	Page 260	<p>1 Sorrell homicide investigation and the</p> <p>2 prosecution of James Fletcher, did you ever</p> <p>3 become aware of any Chicago police fabrication</p> <p>4 of evidence?</p> <p>5 A. I am not aware of that.</p> <p>6 Q. During the pendency of the Willie</p> <p>7 Sorrell homicide investigation and the</p> <p>8 prosecution of James Fletcher, did you ever</p> <p>9 become aware of the Chicago police concealing</p> <p>10 any exculpatory evidence?</p> <p>11 A. I am not aware of that.</p> <p>12 Q. If you had become aware of any of the</p> <p>13 things that I just listed for you, would you</p> <p>14 have turned that information over either in the</p> <p>15 form -- either to the defense attorneys, or</p> <p>16 would you have documented it the State's</p> <p>17 Attorney's file?</p> <p>18 MR. COYNE: Objection; form and foundation.</p> <p>19 Incomplete hypothetical and requires the witness</p> <p>20 to speculate.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I cannot answer that because it</p> <p>23 requires me to speculate.</p> <p>24 BY MR. STARR:</p>



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Page 261	<p>1 <b>Q. Do you have any involvement in the</b></p> <p>2 <b>criminal prosecution of James Fletcher?</b></p> <p>3 A. No.</p> <p>4 <b>Q. What do you understand undue or</b></p> <p>5 <b>wrongful influence in the context of police</b></p> <p>6 <b>identification procedures to mean?</b></p> <p>7 MR. COYNE: Objection; form, foundation.</p> <p>8 MR. HOLMES: 26(a)(2) objection on behalf of</p> <p>9 the Office.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Could you repeat the question, please.</p> <p>12 BY MR. STARR:</p> <p>13 <b>Q. Yeah. Just in the interest of time,</b></p> <p>14 <b>I'm just going to give you my deposition --</b></p> <p>15 <b>definition and see if you agree with it.</b></p> <p>16 <b>When I say undue or wrongful influence</b></p> <p>17 <b>on identification procedures, what I'm referring</b></p> <p>18 <b>to is influence by which a person is induced to</b></p> <p>19 <b>act otherwise than by their own free will or</b></p> <p>20 <b>without adequate attention to the consequences.</b></p> <p>21 <b>Does that make sense?</b></p> <p>22 A. Yes.</p> <p>23 MR. COYNE: Objection, form.</p> <p>24 BY MR. STARR:</p>	Page 263	<p>1 <b>cases?</b></p> <p>2 MR. COYNE: Objection, form and foundation.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I am not aware of that.</p> <p>5 BY MR. STARR:</p> <p>6 <b>Q. If you had -- during the Willie Sorrell</b></p> <p>7 <b>prosecution while you were working on it as a</b></p> <p>8 <b>Felony Review prosecutor and you had learned</b></p> <p>9 <b>that Detectives Bogucki and Schalk had unduly</b></p> <p>10 <b>influenced other identification procedures in</b></p> <p>11 <b>other cases, would you have documented that?</b></p> <p>12 MR. COYNE: Objection; form, foundation.</p> <p>13 Incomplete hypothetical. Requires the witness</p> <p>14 to speculate.</p> <p>15 BY THE WITNESS:</p> <p>16 A. It requires me to speculate. I cannot</p> <p>17 answer.</p> <p>18 MR. COYNE: Yeah. I need -- I need to take a</p> <p>19 break. I've tried to delay it as much as</p> <p>20 possible. I will try to make it ten minutes,</p> <p>21 so --</p> <p>22 MR. STARR: John, I've got -- I've got like</p> <p>23 five more questions.</p> <p>24 MR. COYNE: All right. Well, just let me do</p>
Page 262	<p>1 <b>Q. Okay. Did Detective Bogucki -- strike</b></p> <p>2 <b>that.</b></p> <p>3 <b>Did you ever ask Detective Bogucki if</b></p> <p>4 <b>he ever unduly influenced any of the</b></p> <p>5 <b>identification procedures that occurred during</b></p> <p>6 <b>the police investigation in this case?</b></p> <p>7 A. I --</p> <p>8 MR. COYNE: Objection, form.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I do not recall that.</p> <p>11 BY MR. STARR:</p> <p>12 <b>Q. Do you ever asking Detective Schalk</b></p> <p>13 <b>that?</b></p> <p>14 A. I do not recall that.</p> <p>15 <b>Q. When did you first become aware that</b></p> <p>16 <b>there were allegations that Detectives Bogucki</b></p> <p>17 <b>and Schalk had unduly influenced any of the</b></p> <p>18 <b>identifications?</b></p> <p>19 A. When I was preparing for this</p> <p>20 deposition.</p> <p>21 <b>Q. Have you ever become aware that there</b></p> <p>22 <b>are other allegations by other individuals</b></p> <p>23 <b>regarding Detectives Bogucki and Schalk unduly</b></p> <p>24 <b>influencing identification procedures in other</b></p>	Page 264	<p>1 this. You've got five questions? Give me a</p> <p>2 minute and a half then.</p> <p>3 MR. STARR: Okay.</p> <p>4 MR. COYNE: A minute and a half.</p> <p>5 MR. STARR: We are going off the record.</p> <p>6 (Whereupon, a discussion was had</p> <p>7 off the record.)</p> <p>8 BY MR. STARR:</p> <p>9 <b>Q. All right. Ms. Walker, are you ready?</b></p> <p>10 A. Sure.</p> <p>11 <b>Q. Okay. At any time while there were</b></p> <p>12 <b>murder charges -- strike that.</b></p> <p>13 <b>At any time during the Willie Sorrell</b></p> <p>14 <b>homicide investigation or while there were</b></p> <p>15 <b>murder charges pending against James Fletcher,</b></p> <p>16 <b>did any member of the Chicago Police Department</b></p> <p>17 <b>ever inform you orally or in writing or in any</b></p> <p>18 <b>way at all that either Detective Bogucki,</b></p> <p>19 <b>Detective Schalk, Detective Noradin, or Sergeant</b></p> <p>20 <b>Wojcik unduly influenced any of the</b></p> <p>21 <b>identification procedures in this case?</b></p> <p>22 A. I do not recall that.</p> <p>23 <b>Q. Does knowing that James Fletcher has</b></p> <p>24 <b>been exonerated and received a certificate of</b></p>

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Page 265	<p>1 <b>innocence affect your opinion about whether or</b></p> <p>2 <b>not he is guilty?</b></p> <p>3 MR. COYNE: Objection; form, foundation.</p> <p>4 Calls for speculation, and also if -- I would</p> <p>5 instruct you not to answer any questions,</p> <p>6 including this question, Jennifer, if it would</p> <p>7 need or require you to offer your opinion on the</p> <p>8 evidence or your decision-making regarding this</p> <p>9 case and the result of this case.</p> <p>10 MR. HOLMES: On behalf of the Office, joined</p> <p>11 on the ground of deliberative process privilege</p> <p>12 and same guidance and same instruction.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Would you repeat the question, please?</p> <p>15 BY MR. STARR:</p> <p>16 <b>Q. Yeah.</b></p> <p>17 <b>Does learning that Mr. Fletcher has</b></p> <p>18 <b>been exonerated and has received the certificate</b></p> <p>19 <b>of innocence have any bearing whatsoever on your</b></p> <p>20 <b>opinion of whether or not he is guilty or</b></p> <p>21 <b>innocent of the Willie Sorrell homicide?</b></p> <p>22 MR. COYNE: Same objection. Same</p> <p>23 instruction.</p> <p>24 MR. HOLMES: Same guidance and instruction.</p>
Page 267	<p>1 whether you have an opinion, Jennifer. But I</p> <p>2 would instruct you not to answer if you -- to</p> <p>3 the extent you do have an opinion and as to what</p> <p>4 that opinion may be.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I do not have an opinion.</p> <p>7 MR. STARR: John, I realize I want to ask her</p> <p>8 a question about one of the exhibits that</p> <p>9 Allyson used.</p> <p>10 Do you have time to spare now, or where</p> <p>11 are you at?</p> <p>12 MR. COYNE: I've got about -- I've got</p> <p>13 about -- I'm pushing this back based on your</p> <p>14 representation of five questions, Sean. That</p> <p>15 was an agreement we had. I recognize you as a</p> <p>16 man of integrity, so I will roll about five more</p> <p>17 minutes, but then I am going to have to -- I'm</p> <p>18 going to have to take a much longer break.</p> <p>19 MR. STARR: Okay. All right. Let me do my</p> <p>20 best here.</p> <p>21 BY MR. STARR:</p> <p>22 <b>Q. All right. This is -- I'm trying to</b></p> <p>23 <b>share my screen.</b></p> <p>24 <b>Do you see the screen, ma'am?</b></p>
Page 266	<p>1 BY THE WITNESS:</p> <p>2 A. I can't answer that.</p> <p>3 BY MR. STARR:</p> <p>4 <b>Q. Why can't you answer that?</b></p> <p>5 MR. HOLMES: Same guidance and answer.</p> <p>6 MR. COYNE: Agreed -- join. Same as before</p> <p>7 given.</p> <p>8 BY THE WITNESS:</p> <p>9 A. It would require me to just -- it would</p> <p>10 require me to get into work product and</p> <p>11 deliberative process, so I can't answer that.</p> <p>12 BY MR. STARR:</p> <p>13 <b>Q. So are you taking your attorney's</b></p> <p>14 <b>recommendation and refusing to answer my</b></p> <p>15 <b>question?</b></p> <p>16 A. I am.</p> <p>17 <b>Q. Okay. Do you have any opinion about</b></p> <p>18 <b>whether or not James Fletcher is guilty or</b></p> <p>19 <b>innocent of the murder of Willie Sorrell?</b></p> <p>20 MR. COYNE: Objection, foundation.</p> <p>21 MR. HOLMES: Deliberative process objection</p> <p>22 on behalf of the Office.</p> <p>23 MR. COYNE: You do not -- if you answer --</p> <p>24 you can answer the question. The question is</p>
Page 268	<p>1 <b>(Walker Exhibit No. 1 published</b></p> <p>2 <b>to Zoom participants.)</b></p> <p>3 BY THE WITNESS:</p> <p>4 A. Yes.</p> <p>5 BY MR. STARR:</p> <p>6 <b>Q. Okay. I just wanted to ask you just a</b></p> <p>7 <b>couple of questions. Allyson shared this. I</b></p> <p>8 <b>believe this is marked as Exhibit No. 1.</b></p> <p>9 <b>This is the State's Attorney's file,</b></p> <p>10 <b>correct?</b></p> <p>11 A. It's the Felony Review folders, yes.</p> <p>12 <b>Q. Okay.</b></p> <p>13 A. Or it -- or it looks like Felony Review</p> <p>14 folders. That's what it looks like.</p> <p>15 <b>Q. Okay.</b></p> <p>16 A. And they say James Fletcher on them.</p> <p>17 <b>Q. And on 3015 -- Bates 3015.</b></p> <p>18 <b>Do you see that down at the bottom,</b></p> <p>19 <b>ma'am?</b></p> <p>20 A. Could you -- what's the date at the top</p> <p>21 of the Felony Review file, please? The 13th?</p> <p>22 Okay.</p> <p>23 <b>Q. February 13, '02.</b></p> <p>24 A. I found it. I found the page, yes.</p>

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<p style="text-align: right;">Page 269</p> <p>1       <b>Q. Okay. I'm just going to zoom in a</b>  2       <b>little bit. And this section here on the bottom</b>  3       <b>right-hand side, we looked at this earlier.</b>  4       <b>Do you recall that, ma'am?</b>  5       A. Yes.  6       <b>Q. And it says, "defendant in photo lineup</b>  7       <b>on 13 February '02," and then it says, "oral" --</b>  8       <b>something crossed out -- "only - no grand jury</b>  9       <b>per ASA O'Brien."</b>  10       <b>Do you see that, ma'am?</b>  11       A. I -- I see those words, yes.  12       <b>Q. What is -- what does "no grand jury"</b>  13       <b>mean to you, ma'am?</b>  14       MS. WEST: Objection. Asked and --  15       MR. COYNE: First of all, this question has  16       been asked and answered. And we -- it was fully  17       vetted and -- prior in the deposition, number  18       one.  19       Number two, the same instruction. The  20       witness -- as you may recall, Sean, we took a  21       break for the witness to confer with counsel,  22       and the witness stated that she could not answer  23       this question based upon work product and/or  24       deliberative process privilege.</p>	<p style="text-align: right;">Page 271</p> <p>1       work product privilege earlier that she could  2       not answer questions regarding that indication,  3       because it would require her to reveal  4       privileged material.  5       So the same instruction as earlier  6       given, Jennifer.  7       MR. HOLMES: I object on behalf of the  8       State's Attorney's Office on the grounds of  9       deliberative process privilege and instruct the  10       witness not to answer to the extent her answer  11       would reveal deliberations of the Office in  12       reference to charging decisions and grand jury  13       presentations.  14       BY MR. STARR:  15       <b>Q. Are you going to take your attorney's</b>  16       <b>instruction and not answer my questions?</b>  17       A. Yes.  18       <b>Q. And maybe I can short-circuit this.</b>  19       <b>Are you going to take that same</b>  20       <b>instruction and refuse to answer any questions I</b>  21       <b>might ask you about this notation of "no grand</b>  22       <b>jury"?</b>  23       A. Most likely.  24       <b>Q. Okay. Let me ask you some questions</b></p>
<p style="text-align: right;">Page 270</p> <p>1       So this has all been gone over. We're  2       just retreading material that's already been  3       addressed in this -- and resolved in this  4       deposition earlier, just for the record.  5       MR. STARR: I don't know if I would agree  6       that it was resolved, but I'll try to reask it.  7       BY MR. STARR:  8       <b>Q. Is that a -- is that a notation that</b>  9       <b>you would commonly see in a State's Attorney's</b>  10       <b>Felony Review file?</b>  11       MR. COYNE: Objection, form.  12       BY THE WITNESS:  13       A. I'm not sure what you mean by "commonly  14       see." It is -- it's a notation that could be  15       seen in a Felony Review file based on my  16       experience in Felony Review review back in 2002.  17       BY MR. STARR:  18       <b>Q. Is one of the reasons why that notation</b>  19       <b>might be made as a general matter of practice</b>  20       <b>because the witness may not be a good witness to</b>  21       <b>testify to the grand jury?</b>  22       MR. COYNE: Objection; form, foundation.  23       Once again, this line of questioning has been  24       precluded by the witness's invocation of the</p>	<p style="text-align: right;">Page 272</p> <p>1       <b>about 3024, which I will see if I can give you</b>  2       <b>the date as well. I believe the date is</b>  3       <b>March 16, 2002 on this one.</b>  4       A. All right.  5       <b>Q. Okay. Do you see this 3024 down here?</b>  6       A. Yes. I see -- I have that --  7       <b>Q. Okay.</b>  8       A. -- in front of me.  9       <b>Q. It's this box about the witness Emmett</b>  10       <b>Wade.</b>  11       A. Yes.  12       <b>Q. Okay. And do you see the "Means of ID"</b>  13       <b>column here?</b>  14       A. I -- yes. The row?  15       <b>Q. Yeah. And so there is several</b>  16       <b>different categories within this: "Photo Array,</b>  17       <b>Lineup Show-up, Knows Defendant," and one that</b>  18       <b>says, "No ID."</b>  19       <b>Do you see that?</b>  20       A. Well, I see "Means of ID. Knows" -- I  21       see "Means of ID" -- where did I -- where was  22       it? "Photo Array, Lineup, Show-up, Knows  23       Defendant," and then I see a scribble.  24       <b>Q. Yeah. If you look closely at it it</b></p>

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Page 273	<p>1 says, "No ID." Or if you look in the next box</p> <p>2 down you can see that that is where "No ID"</p> <p>3 falls, correct?</p> <p>4 A. Correct.</p> <p>5 <b>Q. Do you know why there is a scribble</b></p> <p>6 <b>over "No ID" there?</b></p> <p>7 MR. COYNE: Objection, foundation.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I do not.</p> <p>10 BY MR. STARR:</p> <p>11 <b>Q. Okay. And this purports to be an</b></p> <p>12 <b>interview with Mr. Wade that occurred on</b></p> <p>13 <b>March 16th, 2002, correct?</b></p> <p>14 A. Well --</p> <p>15 MR. COYNE: Object, asked and answered. This</p> <p>16 was all gone over before.</p> <p>17 Go ahead. You can answer it all again.</p> <p>18 BY THE WITNESS:</p> <p>19 A. So I don't recall making this document.</p> <p>20 Although, the handwriting does look like it</p> <p>21 could be my handwriting. I don't have any</p> <p>22 independent recollection of my -- any</p> <p>23 conversation with Mr. Wade. I do see the words</p> <p>24 on the page, and the document says what it says.</p>	Page 275	<p>1 understand -- when you say it looks like another</p> <p>2 interview, I don't know what that is.</p> <p>3 MR. COYNE: And let me interject.</p> <p>4 Sean, in all -- in all -- at long last,</p> <p>5 okay, there they have been multiple material</p> <p>6 representations of how much more time you had.</p> <p>7 You have said five more questions. It's now</p> <p>8 been more than ten. You've said five more</p> <p>9 minutes. I have allowed that.</p> <p>10 Now, I have to take a break, a</p> <p>11 significant break, because I have awaited and in</p> <p>12 good faith relied upon your representations, and</p> <p>13 I shouldn't have. So I'm just telling you.</p> <p>14 MR. STARR: John, John --</p> <p>15 MR. COYNE: I have to take a break.</p> <p>16 MR. STARR: I also didn't expect you to have</p> <p>17 to take a break for your own private practice</p> <p>18 during this deposition.</p> <p>19 MR. COYNE: Well, this -- you know, it's --</p> <p>20 when I have to take a break of -- for is my</p> <p>21 business. The fact is I haven't taken any</p> <p>22 significant break other than taking an emergency</p> <p>23 phone call that lasted approximately three</p> <p>24 minutes.</p>
Page 274	<p>1 BY MR. STARR:</p> <p>2 <b>Q. Okay. And so my question is, is it</b></p> <p>3 <b>your understanding that this is an interview</b></p> <p>4 <b>that took place on March 16, 2002?</b></p> <p>5 MR. COYNE: Objection, foundation.</p> <p>6 BY THE WITNESS:</p> <p>7 A. The -- the document says there was an</p> <p>8 interview by ASA Walker on March 16th of 2002.</p> <p>9 BY MR. STARR:</p> <p>10 <b>Q. Okay. And then on 3030, which the date</b></p> <p>11 <b>is April 20, 2002, there is a date at the top</b></p> <p>12 <b>there.</b></p> <p>13 <b>This is a -- this is appears to be</b></p> <p>14 <b>another interview with Mr. Wade, correct?</b></p> <p>15 MR. COYNE: Objection, foundation. Asked and</p> <p>16 answered.</p> <p>17 BY THE WITNESS:</p> <p>18 A. Well, this is another document that I</p> <p>19 do not have an independent recollection of</p> <p>20 creating. I do not recollect having any --</p> <p>21 having a conversation with Mr. Wade as I sit</p> <p>22 here today. The document says the words</p> <p>23 "interviewed by ASA Walker March -- 16 Mar 02"</p> <p>24 on -- in that -- in that box, but I don't</p>	Page 276	<p>1 Now, if you're going to make</p> <p>2 representations, Sean, you should stick by them,</p> <p>3 because otherwise people rely on them to their</p> <p>4 detriment.</p> <p>5 MR. STARR: You can admonish your client.</p> <p>6 You're not going to admonish me, John.</p> <p>7 MR. COYNE: I'm not admonishing you. I'm</p> <p>8 just saying you have made material</p> <p>9 representations. Those representations have</p> <p>10 been replied upon, and you have violated those</p> <p>11 representations --</p> <p>12 MR. STARR: And just like --</p> <p>13 MR. COYNE: -- for the record.</p> <p>14 MR. STARR: -- we scheduled the deposition</p> <p>15 for 10:00 today. We didn't anticipate you</p> <p>16 taking a personal break to do your own work.</p> <p>17 MR. COYNE: You can go until 8:00 if you</p> <p>18 want. What I said was I need a break, and that</p> <p>19 is not unreasonable, nor is it unexpected, and</p> <p>20 it's going to have to last a significant period</p> <p>21 of time. Now, I --</p> <p>22 MR. STARR: I will --</p> <p>23 THE COURT REPORTER: I'm sorry. I can't get</p> <p>24 both people speaking at once.</p>

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Page 277	<p>1 MR. COYNE: Let me finish, Sean. I will wait</p> <p>2 until 4:50. At 4:50 I'm leaving for 25 minutes.</p> <p>3 MR. STARR: Okay. I will be done at 4:50,</p> <p>4 John.</p> <p>5 MR. COYNE: All right.</p> <p>6 BY MR. STARR:</p> <p>7 <b>Q. Ms. Walker, do you see this document in</b></p> <p>8 <b>front of you?</b></p> <p>9 A. I do.</p> <p>10 <b>Q. Is this the page you referred to</b></p> <p>11 <b>earlier as being the page that you're not sure</b></p> <p>12 <b>who wrote this page?</b></p> <p>13 A. Correct.</p> <p>14 <b>Q. Okay. And do you see -- you reviewed</b></p> <p>15 <b>this in preparation, right?</b></p> <p>16 A. Yes.</p> <p>17 <b>Q. Okay. And do you see on this page</b></p> <p>18 <b>letter C it says, "Sheene Friend -</b></p> <p>19 <b>inconsistent/17 years old at the time"?</b></p> <p>20 A. I see those words, yes.</p> <p>21 <b>Q. Do you know who wrote this, ma'am?</b></p> <p>22 A. I have no idea.</p> <p>23 <b>Q. Do you have any recollection of</b></p> <p>24 <b>thinking that Sheene Friend's identification of</b></p>	Page 279	<p>1 <b>file, correct?</b></p> <p>2 A. I have no idea.</p> <p>3 <b>Q. Okay. My last question is this: Based</b></p> <p>4 <b>on the documents we looked at earlier, your</b></p> <p>5 <b>initial -- strike that.</b></p> <p>6 <b>Based on the documents it appears that</b></p> <p>7 <b>your initial interview with Mr. Rogers took</b></p> <p>8 <b>place on February 13, 2002.</b></p> <p>9 <b>Do you remember seeing that?</b></p> <p>10 A. I --</p> <p>11 MS. WEST: Asked and answered.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I have no independent recollection of</p> <p>14 any conversation I had with Mr. Rogers, and I</p> <p>15 don't know when that took place.</p> <p>16 BY MR. STARR:</p> <p>17 <b>Q. Okay.</b></p> <p>18 A. If I -- if I spoke with him, I don't</p> <p>19 know when that happened.</p> <p>20 <b>Q. If I represent to you that Mr. Rogers's</b></p> <p>21 <b>handwritten statement was taken on May 8th,</b></p> <p>22 <b>2002, would you believe that representation?</b></p> <p>23 MR. COYNE: Objection. Foundation,</p> <p>24 speculation, and form.</p>
Page 278	<p>1 <b>Mr. Fletcher was inconsistent?</b></p> <p>2 MS. WEST: Objection, foundation.</p> <p>3 MR. COYNE: Objection. The same instruction</p> <p>4 as work product given earlier.</p> <p>5 MR. HOLMES: Same instruction and same</p> <p>6 guidance as to deliberative process privilege.</p> <p>7 BY MR. STARR:</p> <p>8 <b>Q. Are you going to refuse to answer my</b></p> <p>9 <b>question, ma'am?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. Okay. Does this document indicate to</b></p> <p>12 <b>you that somebody in the State's Attorney's</b></p> <p>13 <b>Office thought that Ms. Friend's identification</b></p> <p>14 <b>of Mr. Fletcher was inconsistent?</b></p> <p>15 MS. WEST: Objection.</p> <p>16 MR. COYNE: Objection; foundation,</p> <p>17 speculation. Same instruction.</p> <p>18 MS. WEST: Same. Sorry. It also misstates</p> <p>19 or interprets a document that speaks for itself.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I have no idea who created that</p> <p>22 document or where it came from.</p> <p>23 BY MR. STARR:</p> <p>24 <b>Q. But it's part of the State's Attorney's</b></p>	Page 280	<p>1 BY THE WITNESS:</p> <p>2 A. I -- I'm not trying to fight with you</p> <p>3 that that wasn't the date, but I don't have an</p> <p>4 independent recollection that it was.</p> <p>5 BY MR. STARR:</p> <p>6 <b>Q. Do you know why three months elapsed</b></p> <p>7 <b>between the initial interview of Mr. Rogers and</b></p> <p>8 <b>his handwritten statements?</b></p> <p>9 MR. COYNE: Objection; foundation,</p> <p>10 speculation.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I do not.</p> <p>13 BY MR. STARR:</p> <p>14 <b>Q. Do you recall looking at that</b></p> <p>15 <b>handwritten statement earlier?</b></p> <p>16 A. Prior -- to prepare for today? Yes.</p> <p>17 <b>Q. And then we looked at during the course</b></p> <p>18 <b>of the deposition, correct?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Okay. Last -- I'm just going to show</b></p> <p>21 <b>it to you.</b></p> <p>22 <b>Do you see this document on your</b></p> <p>23 <b>screen?</b></p> <p>24</p>

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<p>1 (Walker Exhibit No. 4 published 2 to Zoom participants.) 3 BY THE WITNESS: 4 A. Yes. 5 BY MR. STARR: 6 <b>Q. And I think we marked this as Exhibit</b> 7 <b>No. 4.</b> 8 <b>Ma'am, do you know why Detective</b> 9 <b>Bogucki's name and Detective Schalk's name are</b> 10 <b>on this document, but then they are crossed out?</b> 11 A. I don't recall, and I would have to 12 speculate to answer. 13 <b>Q. Do you know if Detective Bogucki and</b> 14 <b>Detective Schalk sat in on this statement that</b> 15 <b>Terry Rogers purportedly gave in May 8th, 2002?</b> 16 MR. COYNE: Objection, form and foundation. 17 BY THE WITNESS: 18 A. I don't have -- I don't have an 19 independent recollection of the -- of 20 conversations with Mr. Rogers or taking 21 Mr. Rogers's statement, so I can't answer 22 without speculating. 23 MR. STARR: Okay. Okay. I'm -- for the 24 record, I'm just going to state that I'm going</p>	<p>1 (Deposition concluded at 2 4:48 p.m.) 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>
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<p>1 to end my questions now understanding, John, 2 that you have something to take care of. 3 If Ms. West attempts to bring back this witness, 4 I will have additional questions, but for the 5 purposes of what we discussed on the record and 6 not to belabor the point, I will -- I have no 7 further questions. 8 MR. COYNE: All right. 9 MS. WEST: I don't have anything else. 10 MR. COYNE: Jennifer, you have the right to 11 review your transcript. I would reserve that 12 right. You may want to -- I would suggest -- so 13 the witness reserves signature, and thank you, 14 everyone. 15 MR. STARR: Thank you. 16 MS. WEST: Thank you, Ms. Walker. 17 THE COURT REPORTER: Do you need to order the 18 transcript, Ms. West? 19 MS. WEST: Yes, please. 20 THE COURT REPORTER: Any copy orders? 21 MR. COYNE: No, none here. 22 MR. STARR: None. 23 MR. HOLMES: I don't, Kari. Thank you. 24</p>	





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1                   IN THE UNITED STATES DISTRICT COURT

2                   NORTHERN DISTRICT OF ILLINOIS

3                   EASTERN DIVISION

4                   I, Kari Wiedenhaupt, Certified

5 Shorthand Reporter, do hereby certify that on  
6 February 14, 2024, the deposition of the  
7 witness, JENNIFER WALKER, called by the  
8 Defendant, was taken before me, reported  
9 stenographically, and was thereafter reduced to  
10 typewriting under my direction.

11                   The said deposition was taken via  
12 videoconference, and there were present counsel  
13 as previously set forth.

14                   The said witness, JENNIFER WALKER, was  
15 first duly sworn to tell the truth, the whole  
16 truth, and nothing but the truth, and was then  
17 examined upon oral interrogatories.

18                   I further certify that the foregoing  
19 is a true, accurate, and complete record of the  
20 questions asked of and answers made by the said  
21 witness, JENNIFER WALKER, on the date and time  
22 hereinabove referred to.

23                   The signature of the witness, JENNIFER  
24 WALKER, was reserved by agreement of counsel.

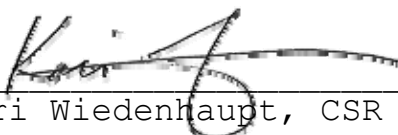
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1           The undersigned is not interested in  
2     the within case, nor of kin or counsel to any of  
3     the parties.

4           Witness my signature as a Certified  
5     Shorthand Reporter in the State of Illinois, on  
6     March 5th, 2024.

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Kari Wiedenhaupt, CSR  
161 North Clark Street  
Suite 3050  
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Phone: 312.361.8851



CSR No. 084-003582

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